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# Environmental Impact Report

## Altamont Sanitary Landfill

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## Volume Two

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# **Environmental Impact Report**

## **Altamont Sanitary Landfill**

**Conditional Use Permit C-3010**

**April 1976**

## **Volume Two**

**Alameda County  
Planning Department  
399 Elmhurst Street, Hayward, California 94544  
(415) 881-6401**



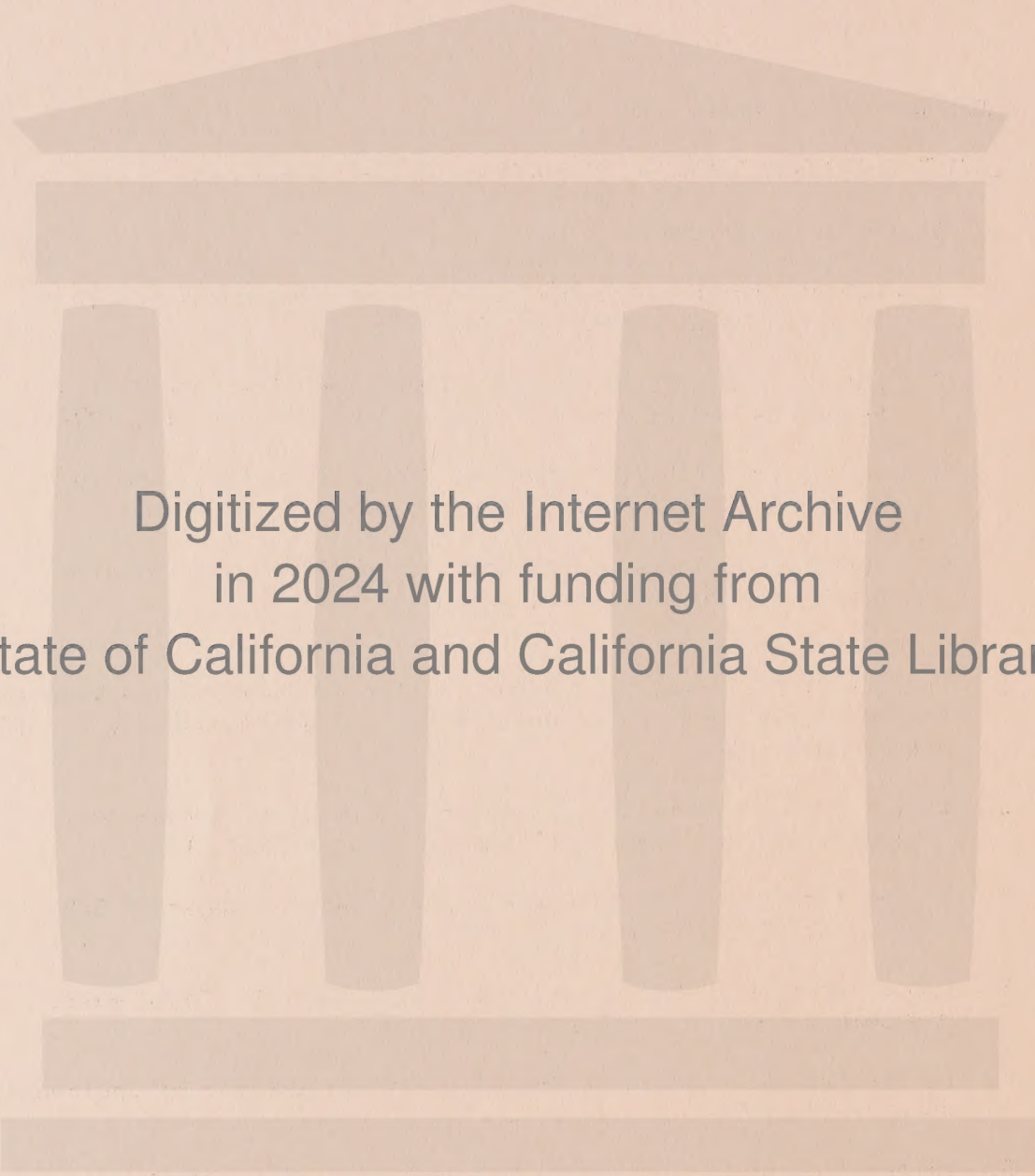


VOLUME II

ENVIRONMENTAL IMPACT REPORT  
ALTAMONT SANITARY LANDFILL  
CONDITIONAL USE PERMIT C-3010

TABLE OF CONTENTS

	<u>PAGE</u>
1. ADDENDUM TO THE DRAFT EIR. . . . .	1
2. LETTER RESPONSES RECEIVED TO REFERRAL OF THE DRAFT EIR . . . . .	17
A. State Clearinghouse . . . . .	17
1. Letter from Kenneth Buell, Chief, Environmental Health Services Branch, February 20, 1976 . . . . .	18
2. Letter from Loyd H. Forrest, Executive Director, Energy Resources and Development Commission, February 17, 1976 . . . . .	19
3. Letter from Albert A. Marino, Executive Officer, Solid Waste Management Board, March 10, 1976 . . . . .	20
4. Letter from Thomas E. Bailey, Acting Chief, State Water Resources Control Board, March 16, 1976 . . . . .	23
B. Letters from William S. Johnson, Senior Engineer, Delta Watershed, California Regional Water Quality Control Board, January 29, 1976 and March 5, 1976 . . . . .	24
C. Letter from Tom Meichtry, Director, Solid Waste Management Division, Oakland Scavenger Company, February 27, 1976 . . . . .	26
D. Letter from Louisa M. Jaskulski, Solid Waste Management Sub- committee, PACE, February 25, 1976 . . . . .	33
E. Letter from Ariel Parkinson, President, Berkeley Solid Waste Management Commission, February 24, 1976 . . . . .	36
F. Letter from R. C. Riddle, Acting Chief, Army Corps of Engineers, January 30, 1976 . . . . .	40
G. Letter from Don Driggs, City Manager, City of Fremont, February 24, 1976 . . . . .	42
H. Letter from Paul E. Lanferman, Engineer-Manager, Alameda County Flood Control and Water Conservation District, February 11, 1976 . . . . .	44
I. Letter from Bruce H. Carter, D.D.S., Chairman, Eden Health Advisory Council, March 9, 1976 . . . . .	45



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Table of Contents  
(Continued)

	<u>PAGE</u>
J. Letter from Robert J. Silva, President, East Bay Chapter of the California Council of Civil Engineers and Land Surveyors, March 1, 1976 . . . . .	47
K. Letter from George R. Musso, Secretary, Livermore Planning Commission, March 11, 1976 . . . . .	48
L. Letter from Donald J. Skinner, Assistant Planning Director, ABAG, March 9, 1976 . . . . .	49
M. Letter from John L. Carroll, Chairman, East Bay Bicycle Coalition, February 27, 1976 . . . . .	51
3. COMMENTS TO LETTER RESPONSES . . . . .	53
A. State Clearinghouse . . . . .	53
1) Environmental Health Services Branch . . . . .	53
2) Energy Resources Conservation and Development Commission . . .	53
3) State Solid Waste Management Board . . . . .	53
4) State Water Resources Control Board . . . . .	55
B. California Regional Water Quality Control Board - Central Valley Region . . . . .	56
C. Oakland Scavenger Company . . . . .	56
D. Political Action Coalition for the Environment (PACE) . . . . .	59
E. Berkeley Solid Waste Management Commission . . . . .	60
F. Army Corps of Engineers . . . . .	61
G. City of Fremont . . . . .	62
H. Alameda County Flood Control and Water Conservation District . .	62
I. Citizens Advisory Council of the Eden Health Care Services Agency . . . . .	63
J. East Bay Chapter of the California Council of Civil Engineers and Land Surveyors . . . . .	63
K. City of Livermore . . . . .	63
L. Association of Bay Area Governments . . . . .	64
M. East Bay Bicycle Coalition . . . . .	65





Table of Contents  
(Continued)

	<u>PAGE</u>
4. MINUTES OF PUBLIC HEARINGS . . . . .	66
A. Zoning Administrator Meeting, January 27, 1976 . . . . .	66
B. Zoning Administrator Meeting, February 24, 1976 . . . . .	67
5. SUMMARY OF SIGNIFICANT COMMENTS ON THE DRAFT EIR RAISED AT PUBLIC HEARINGS DURING THE REFERRAL PERIOD, AND STAFF RESPONSES . . . . .	70
A. Zoning Administrator Meeting, January 27, 1976 . . . . .	70
1. Lois Hill, Coordinator, Livermore Community Recycling Center . . . . .	70
2. Louisa Jaskulski . . . . .	70
B. Zoning Administrator Meeting, February 24, 1976 . . . . .	70
1. Edith Lewis, League of Women Voters of the Hayward Area . . .	70
2. Barbara Shockley, Coordinating Committee of the Eden Health Advisory Council . . . . .	71
3. Sally Harris . . . . .	71

LIST OF ILLUSTRATIONS

A. Drainage Patterns in Vicinity of the Project . . . . .	4
B. Drainage Patterns of Completed Fill . . . . .	5
C. Drainage Detail - Periphery of Fill Areas . . . . .	6
D. Drainage Detail - Periphery of Fill Areas . . . . .	7
E. Details - Typical Valley Subdrain and Earth Buttress . . . . .	8
F. Sections - Haul Road and Drainage Swales . . . . .	9



## PREFACE

The Final Environmental Impact Report on the Altamont Sanitary Land-fill is in two volumes.

Volume One is the basic environmental document which was referred to organizations and interested individuals as the Draft Environmental Impact Report, completed in December, 1975, and referred out on January 9, 1976. Modification and republication of the basic text have not been attempted. References to appropriate changes in the text of the Draft EIR have been made in Volume Two.

Volume Two is the supplementary environmental document including an Addendum to the basic text, duplication of all letters received in response to the Draft EIR during the referral period, duplication of minutes of the January 27, 1976, and February 24, 1976, Zoning Administrator hearings on the project application and Draft EIR, and staff comments on significant issues raised in the review and consultation process. All responses on the Draft EIR received through March 26, 1976, have been included in the Final EIR.

The reader is reminded that the Final Environmental Impact Report is the aggregation of all elements of Volume One and Two, which should be considered as much as practical in forming a judgement on the environmental consequences of the project.





ADDENDUM TO THE DRAFT EIR





## ADDENDUM TO THE DRAFT EIR

This EIR has been prepared with emphasis on provision of generally understandable, manageable data. Information in technical documents prepared by applicant's consultants has been refined to be useful to lay decision-makers and general public. While thus serving the broadest interests in carrying out CEQA, the document is not intended to resolve all technical issues to the satisfaction of agencies with responsibility for review of complex engineering concerns from a more narrow perspective. The following project design drawings and technical reports referenced in the Draft EIR are in open file in the Alameda County Planning Department staff offices and remain available for review by those requiring technical data.

1. Bissell & Karn, Design Drawings, Proposed Altamont Sanitary Landfill, 8 sheets including grading plans, details, drainage plan, phasing plan, canyon profiles and cross-section, August, 1975.
2. Oakland Scavenger Company, Project Report: A Long-Range Solid Waste Management Program, June, 1975.
3. Bissell & Karn, Addendum to the Project Report, August, 1975.
4. Woodward-Clyde Consultants, Soils, Geology, and Groundwater Investigation, Altamont Landfill Site, June 25, 1975.

Discussion in the Draft EIR of drainage, groundwater and leachate, and mitigation measures has drawn comments from several reviewers. The following information based on the Addendum Report of Bissell and Karn is intended to supplement the corresponding sections of the Draft EIR. Recommendations of Woodward-Clyde in the Soils, Geologic, and Groundwater Investigation are duplicated to add to the examination of mitigation measures.

### DRAINAGE:

Illustrations on Pages 4 and 5 of this Addendum show the existing and proposed drainage pattern on the site and in the surrounding area. Existing surface drainage is characterized by relatively low runoff flows collecting in swales and canyons and draining from the site at approximately five primary points. All but 133 acres of the 1,540 acre site drains to the east into the San Joaquin Valley, placing almost 92% of the site in the jurisdiction of the Central Valley Regional Water Quality Control Board. The 133 acre area, which is located at the northwest corner of the site, drains westerly into Altamont Creek and the Livermore Valley. This area

is in the jurisdiction of the San Francisco Regional Water Quality Control Board, but discussions with the San Francisco Board staff indicate that primary responsibility will be through the Central Valley Board. The largest portion of the site, approximately 940 acres, covers the north half of Section 21 and the south halves of Sections 15 and 16, and drains easterly across the California Aqueduct and the Delta-Mendota Canal into the San Joaquin Valley. The remaining 467 acres is drained by three separate stream channels north and east into Bethany Reservoir on the California Aqueduct. These existing drainage patterns will generally remain unchanged. Minor modifications will occur where final fill contours will cause several acres to be diverted from one watershed to another. Where such changes occur, the aim will be to divert flow away from watersheds draining into Bethany Reservoir. One significant modification will occur at the northwest corner of the site where the fill will be graded to divert approximately 70 acres easterly into the 940 acre area which drains across the Aqueduct into the San Joaquin Valley. With this change, drainage from virtually all of the fill areas will be within the area under the jurisdiction of the Central Valley Regional Water Quality Control Board. More specific and detailed drainage facilities will be developed at a later time in cooperation with the Regional Water Quality Control Board to satisfy that agency's stringent requirements for an operating permit.

As shown by the details on Pages 6 and 7 of this Addendum, surface runoff will generally be handled by triangular or trapezoidal shaped drainage ditches located around the periphery of the fill areas, and by pipe systems where slopes become steep and significant erosion could occur, such as down the face of the fill. In general, runoff from adjoining hill-sides will not be allowed to run onto the fill, except in special circumstances where permitted by the Regional Water Quality Control Board. Ditches will be lined where runoff velocities become erosive (more than approximately 5 feet per second). Typical drainage details at the top of a typical fill face and at intermediate benches were referred to on Page 12 of the Draft EIR, but were not illustrated. These details are shown on Page 9 of this Addendum.

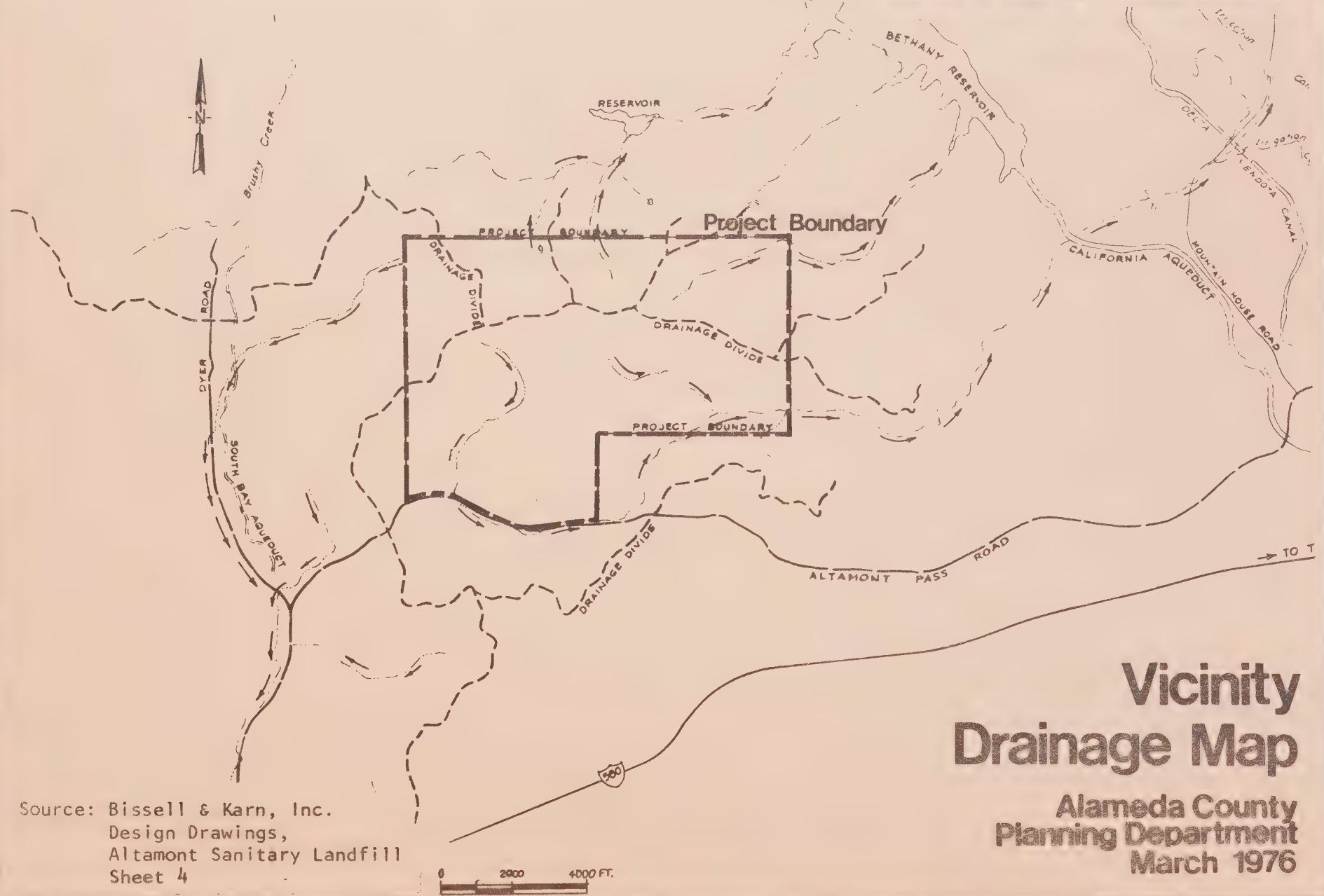
#### GROUNDWATER AND LEACHATE:

Groundwater is discussed in extensive detail in the report by Woodward-Clyde Associates. There is not extensive groundwater on the site and existing meager amounts will be largely removed in the course of excavation for earth cover material. The gravel underdrain shown on Page 8 of this Addendum will be placed under the fill along the low point of each canyon and any significant lateral swales to assure a means of conveying seepage or spring water out of the fill area without allowing it to mix with the fill. Thus, percolation of surface rainfall will be the primary source of water which might accumulate in the fill and result in the production of leachate.

Rainfall in the Altamont area is very low, approximately 12 inches annually. Evaporation rates are high, approximately 60 inches annually from open water surface. The evapo-transpiration rate for grassland hills would be expected to be lower than this free water surface evaporation rate. In any case, the area can be classed as near-arid, and the combination of surface drainage and light rainfall will reduce to an insignificant amount the volume of water remaining within the fill. Any water finding its way into the fill will be used within the landfill to aid the chemical reactions of the decomposition process. Additional rainfall will be absorbed by the fill material and the earth cover material. The net effect of all these factors is the expectation that leachate formation will be minimized. Any leachate that might form can be expected to accumulate at the lowest point of the fill behind the earth key (shown on a typical section of the fill face on Page 8 of this Addendum. Here a monitoring pipe will be installed to check accumulation of leachate, and to draw off any accumulation. The earth key will not be utilized as an earth dam to store leachate.



# EIR - Altamont Sanitary Landfill





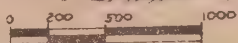
# EIR - Altamont Sanitary Landfill



## Completed Fill Drainage Site Plan

Alameda County  
Planning Department  
March 1976

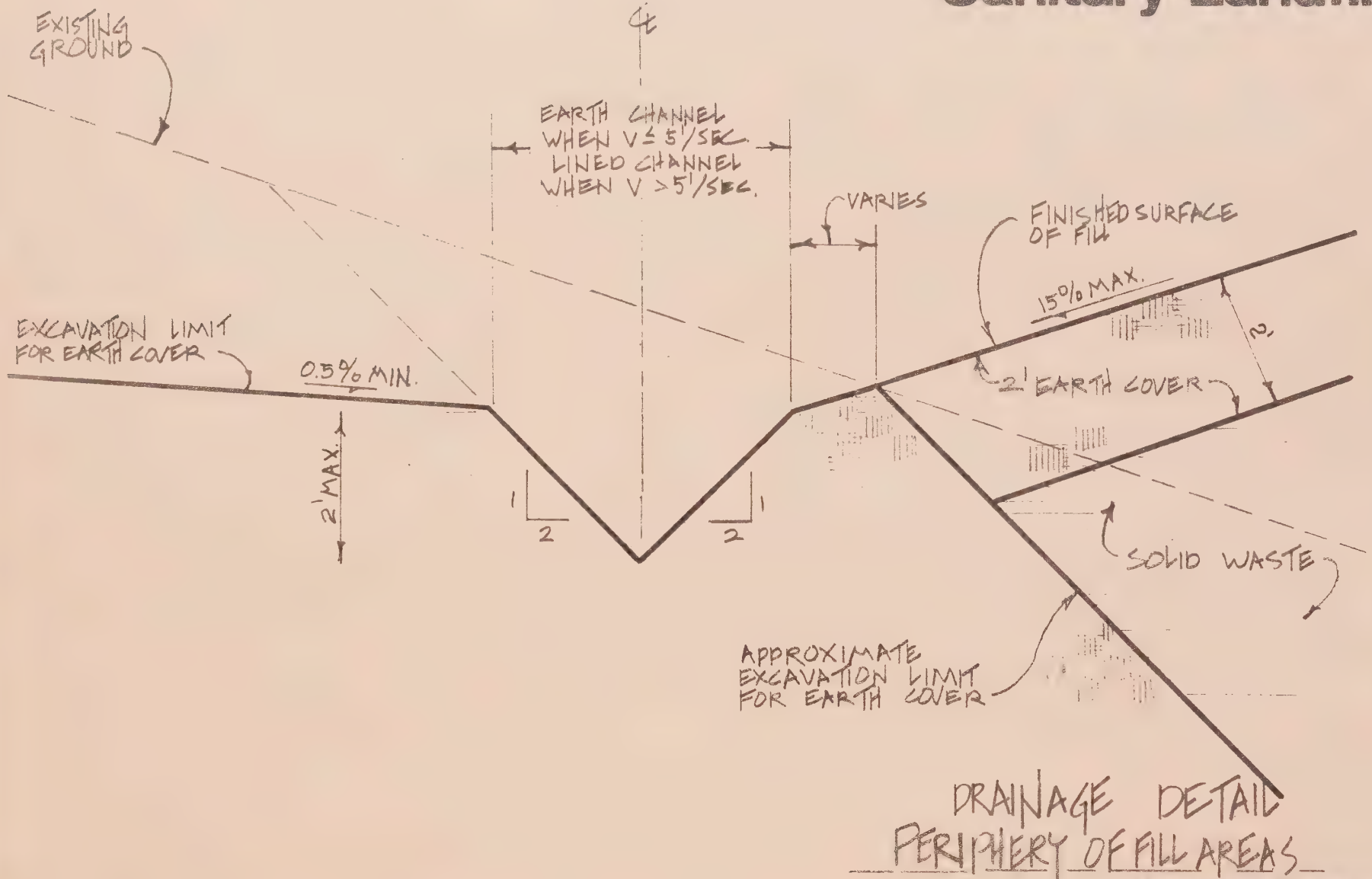
Source: Bissell & Karn, Inc. Scale:



Refer to page 4 for off site drainage patterns



# EIR - Altamont Sanitary Landfill

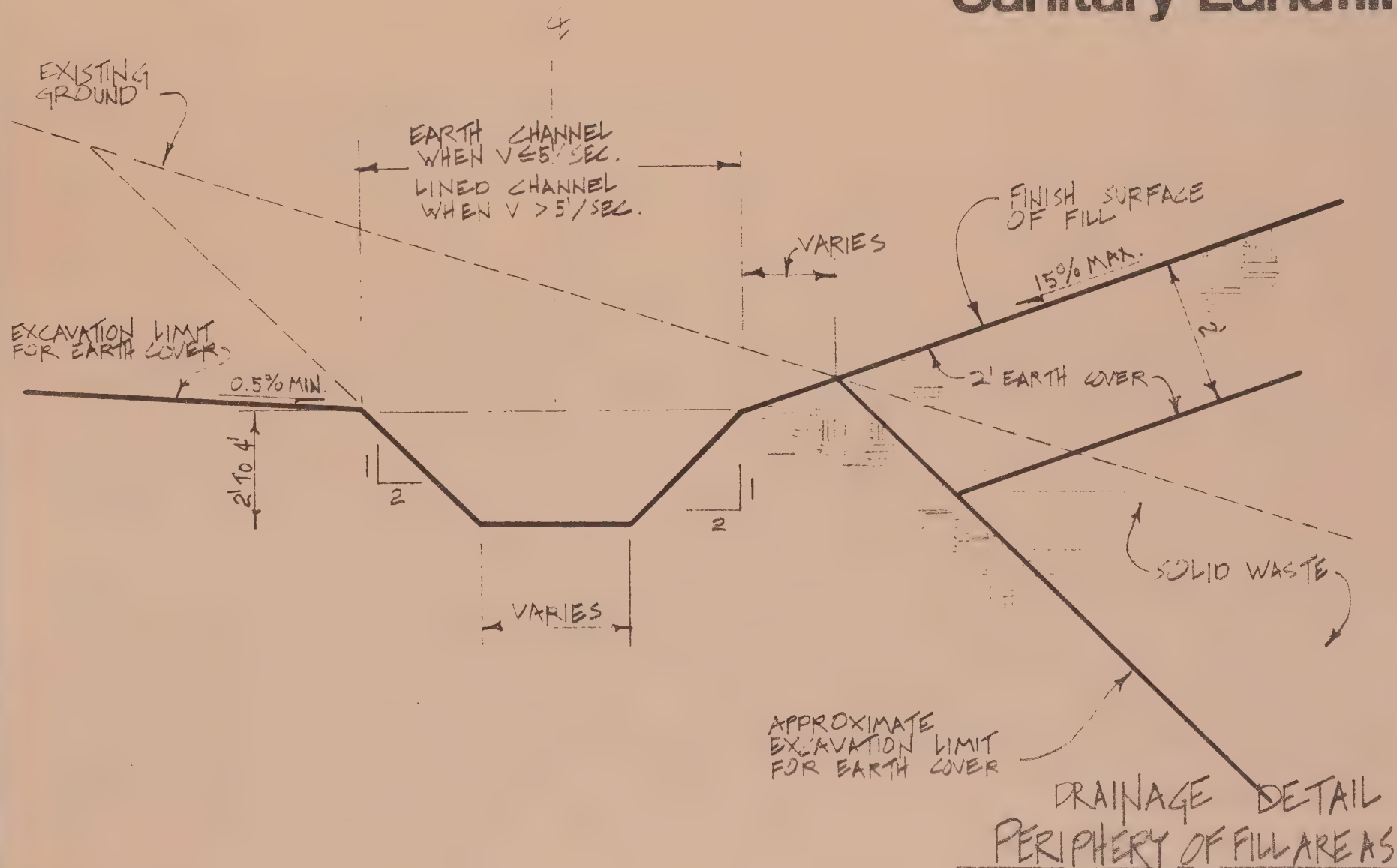


Source: Bissell & Karn, Inc.  
Design Drawings,  
Altamont Sanitary Landfill  
Sheet 5

Alameda County  
Planning Department  
March 1976



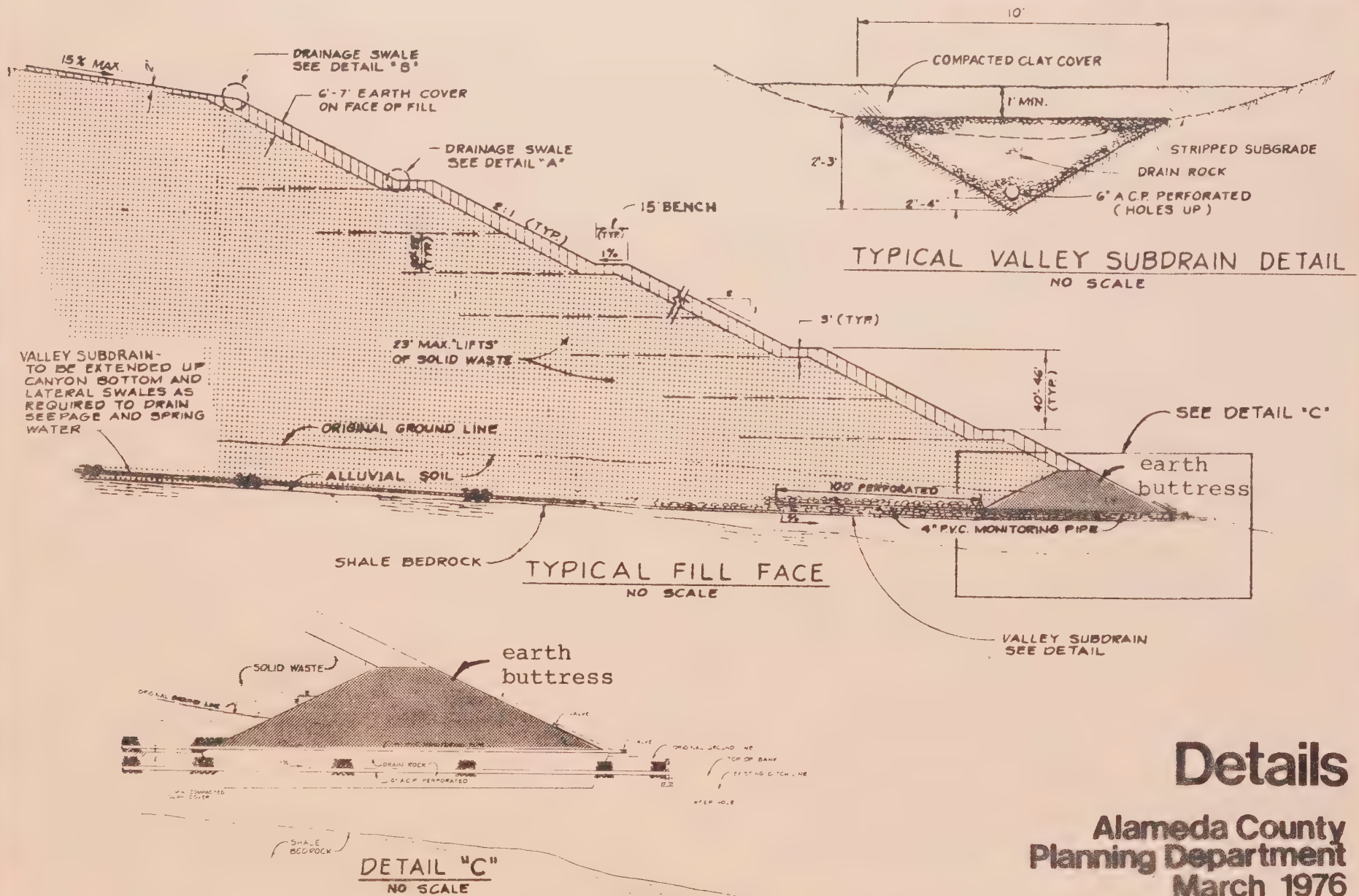
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Altamont Sanitary Landfill  
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# EIR - Altamont Sanitary Landfill



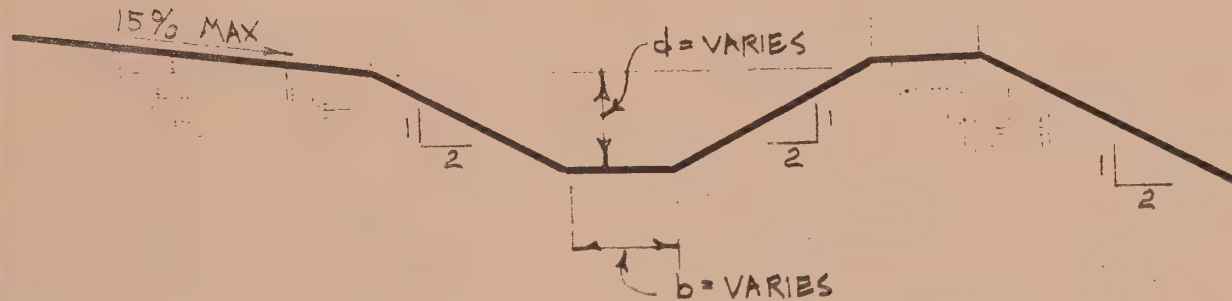
Source: Bissell & Karn, Inc.

**Details**  
Alameda County  
Planning Department  
March 1976

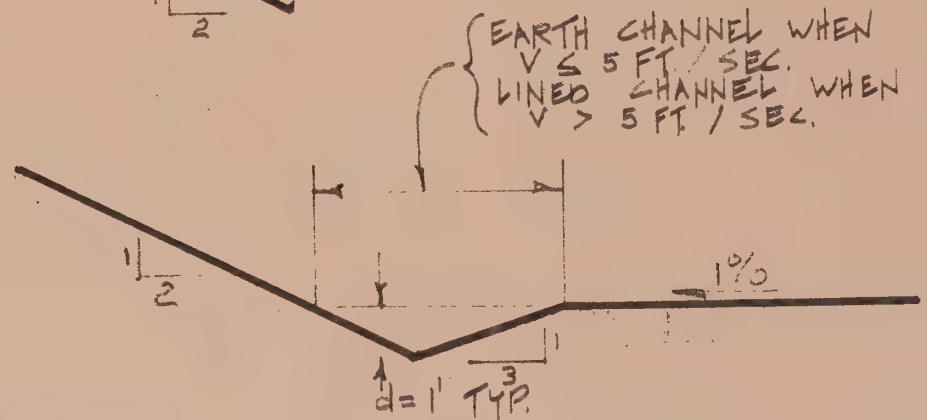
Source: Bissell & Karn, Inc.  
Design Drawings,  
Altamont Sanitary Landfill  
Sheet 4

# EIR - Altamont Sanitary Landfill

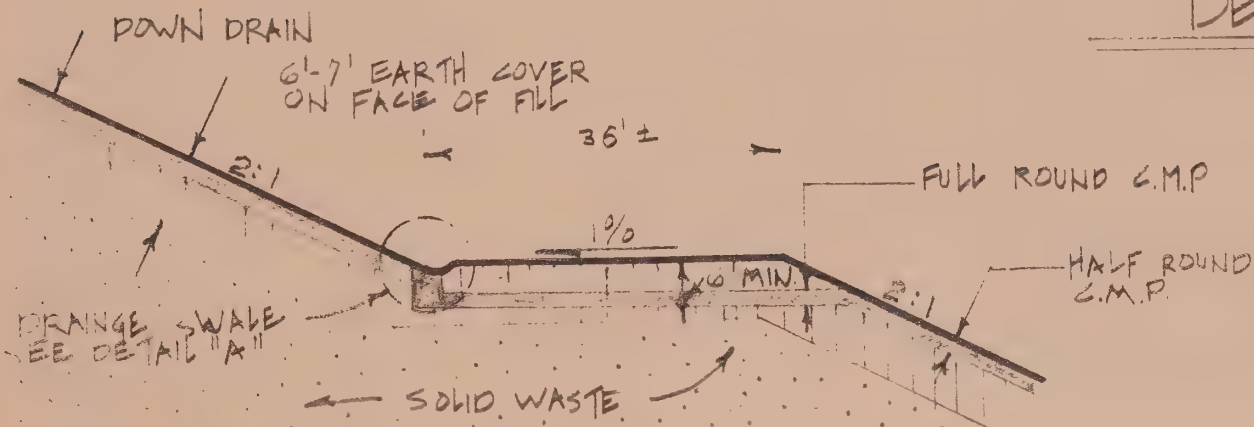
EARTH CHANNEL WHEN  $V \leq 5' / \text{SEC}$   $4' \pm$   
LINED CHANNEL WHEN  $V > 5' / \text{SEC}$ .



DETAIL "B"



DETAIL "A"



HAUL ROAD TYPICAL SECTION

Alameda County  
Planning Department  
March 1976



## RECOMMENDATIONS

### GENERAL

To develop the 1600-acre site as a sanitary landfill, the filling should commence in valley areas. On-site cover soil may be obtained from stripping the valleys and hillsides in areas to be covered. Cover may also be obtained by quarrying off hilltops.

The following recommendations are intended to apply to all landfill cells in all valleys at the site, with operational modifications if shown to be appropriate as experience is gained with the site.

### SITE PREPARATION

If the ultimate use of the landfill site is to be agricultural, it is recommended that topsoil be stripped from the site and stockpiled for later use as cover over the completed landfill.

After topsoil stripping is completed, deeper excavation may be done as required to generate cover material for the landfill. It is recommended that excavation cut slopes be no greater than 1-1/2 horizontal to 1 vertical. Excavation in landslide areas may cause temporary slope instability, therefore flatter cut slopes may be necessary to avoid landslides. Deep stripping in the valley bottoms may encounter the water table in the alluvium. In this case, the excavated soils will be wet and may require drying before re-use as compacted fill material.

### SUBSURFACE DRAINAGE FACILITIES

It is recommended that after excavation is completed to final subgrade a gravel subdrain be placed along the lowest major flow line of each valley which is to be filled with refuse. This subdrain should be constructed in accordance with the details shown in Figure 75. This subdrain should be placed in a shallow v-shaped ditch about 2 to 3 feet deep and 10 feet wide. A six-inch diameter non-metallic strong perforated pipe should be placed with holes up on the vee subgrade and then backfilled to general subgrade level with subdrain gravel graded according to the requirements given below.



<u>Sieve Size</u>	<u>Percentage Passing Sieves</u>
1-1/2"	100
3/4"	50-100
3/8"	0-100
No. 4	0- 95
No. 8	0- 80
No. 30	0- 50
No. 50	0- 35
No. 200	0- 5

The subdrain should start at the upstream toe of the earth key (recommended later in Earthwork and Construction) and be extended well upstream of the advancing toe of refuse fill so that subdrain continuity is maintained. The subdrain should be terminated as recommended by the Soil Engineer.

In addition to the above recommended valley subdrains, it is recommended that lateral subdrains be placed on the excavated subgrade up each major side ravine and into every major seepage area exposed by excavation. The lateral subdrain should be constructed in a manner similar to the valley subdrain except that the pipe may be eliminated. The gravel in the lateral subdrains must be tied into the valley subdrain or other free draining outlet.

If unforeseen seepage or slope problems arise during excavation, it is recommended that the Soil Engineer be consulted for further recommendations of a specific nature.

#### EARTHWORK AND CELL CONSTRUCTION

It is recommended that an element in each valley landfill be a compacted earth fill key placed at the downstream toe of the refuse fill. This earth key should be constructed on a subgrade excavated 3 feet further below the stripped subgrade of the valley.

Prior to commencing the earth key, a tight-joint non-metallic outlet pipe at least 6 inches in diameter should be placed in a trench or v-ditch to provide an outlet for the typical valley subdrain. The backfill over the outlet pipe should be clayey soil compacted to 90 percent (California Test

Method 216-G) in order to form a positive downstream cutoff for the sub-drain gravel. The outlet pipe should be exposed downstream from the toe of the earth key.

The earth key should then be placed using on-site shale or lean clay placed and compacted in accordance with the enclosed specifications for engineered fills. All earth key fill should be compacted to a minimum of 90 percent (California Test Method 216-G).

When about 5 feet of earth key is in place, a plastic leachate monitoring pipe should be installed at a low point. The leachate pipe should be provided with a non-corrosive valve downstream of the earth key and a riser pipe to facilitate inspection for leachate. The upstream end of the leachate pipe should extend 75 to 100 feet beyond the earth key to place it well under the refuse. The upstream 75 feet of pipe should be perforated and covered with 1 to 2 feet of subdrain gravel. It is our opinion that the potential for leachate accumulation is slight; but, the best time for leachate pipe installation is when the earth key is placed.

With this leachate pipe in place, the earth key should be brought to final grade. It is recommended that the earth key be 20 to 24 feet high, at least 15 feet wide at the top and have side slopes of 2 horizontal to 1 vertical.

When the earth key and subdrain are completed, placement of landfill can be commenced. The refuse should be placed in reasonably level lifts behind the earth key. The soil cover layers over the refuse should be placed following the latest accepted landfill practices. It is recommended that a daily cover be provided which consists of a minimum of 6 inches of track-rolled soil comprised of on-site clays or shale. When required, an intermediate cover should consist of 12 inches of compacted fill.

The front face cover fill should be constructed of on-site clay or shale placed to form a 15-foot wide (horizontally) zone of compacted earth fill. The finished downstream slope of this face fill should be no steeper than 2 horizontal to 1 vertical and the central 7-1/2 feet of the fill, measuring horizontally, should be compacted in 8-inch lifts to a minimum of 85 percent (California Test Method 216-G). The inner and outer 3-3/4 feet of fill

will likely have a lower compaction due to lack of slope confinement. The sloping front face fill should be brought up with the refuse, and at benches there should always be a minimum thickness of 3 feet of soil fill.

Earth fill benches at least 15 feet wide should be provided at no more than 45 foot intervals measured vertically from the top of the earth fill key. The bench surface should be sloped front to back about 1 percent to direct surface runoff away from the face. The bench surface should be sloped about 1 percent to drain to the centerline of the landfill front face. At this point all ditch runoff should be collected in such a manner as to eliminate erosion of the sloping face of the entire landfill, see section on erosion control.

If haul roads are planned on the sloping face fill, it is recommended that the road be supported on an inclined earth fill bench at least 30 feet wide and at least 6 feet thick. The upper 5 feet of fill under the haul road should be compacted to 90 percent (California Test Method 216-G).

When the entire landfill in each valley is completed to its full height, a final cover of 2 feet of shale or clay fill should be placed and compacted to a minimum of 85 percent (California Test Method 216-G). The final slope of the top of the landfill should be inclined toward the edges of the fill (towards the surrounding hills and fill face) to facilitate positive surface drainage even after long-term refuse settlements occur. It is recommended that the final slope of the surface cover be no steeper than 15 percent to avoid erosion. The landfill surface should be maintained to assure that no surface water ponding occurs.

#### EROSION CONTROL

It is recommended that some seeding treatment such as hydromulch be applied to the sloping 2 to 1 face fill as it is brought up with the refuse. Treatment should be applied periodically as the slope is constructed so that erosion control of the face is assured.

In general, it is recommended that the Civil Engineer devise a comprehensive layout of ditches, drainage swales and pipes to be placed throughout the landfill area to safely channel surface runoff away from the landfill so that erosion is minimized.



It is likely that erosion will not be a serious problem at this site if a conscientious runoff control program is maintained by the landfill operator. If local erratic settlement of the landfill surface occurs, some wet weather ponding may possibly occur. In such cases, it is recommended that the low area be regraded and filled promptly to ensure positive runoff flow and to minimize infiltration during the life of the landfill.

#### GROUNDWATER QUALITY MONITORING

It is recommended that once the baseline range of water quality in the groundwater is established, specific key ions should be selected for monitoring any changes in the groundwater quality that might occur with time. These key ions should not be selected until after the range of concentration of specific constituents in the groundwater has been determined.

A water quality monitoring program should be developed according to the earlier recommendations for the monitoring program.

#### ROADS

It is recommended that the main truck access road into the landfill operation be designed as a paved, high-quality, two-lane road suitable for all-weather operations. It is also recommended that main truck access road fills that cross ravines or valleys be placed using the same earth fill recommendations as given for the earth key fills described earlier, except for those roads located on landfill. An adequate culvert should be placed through each ravine fill to preserve drainage. If excessive soft soil is encountered when stripping for the base of the road fill, the Soil Engineer should be contacted for further recommendations.

Where access roads are placed in hillside cuts, the steepest cut slope should not exceed 1 to 1, except that the top 5 feet of the cut should be 1-1/2 horizontal to 1 vertical to enhance topsoil stability. The maximum vertical height of cut slope should not exceed 25 feet without providing an 8-foot-wide bench to intercept talus and drainage.

Where access roads are placed both on cut and fill, on a side hill slope, which is steeper than 6 horizontal to 1 vertical, the area to be filled should be stripped to a depth sufficient to remove plastic and potentially unstable surface soils and the roadway fill keyed well into the subsoil using



a level key. No fills should be placed on landslide debris, and cuts into landslides should be avoided or supported with retaining walls.

Road fills up the sloping fill face of the refuse should be designed according to the earlier recommendations for cell construction.

For purposes of pavement design, an average subgrade "R" value of 8 should be assumed. If the road subgrade is in highly plastic clayey alluvium, additional "R" value tests should be made. It is recommended that consideration be given to importing aggregate base course from nearby existing sources for the first phase of the access road up to the earth key. As discussed in the Conclusion section, there may not be economic justification to opening an on-site sandstone borrow area for a short section of road.

#### BORROW AREAS ON HILLTOPS

It is recommended that consideration be given to obtaining additional soil and shale cover as well as sandstone aggregate from hilltop borrow areas. Borrow pits for clayey or shaley cover material can be located almost anywhere on the site. The shaley clay has low permeability when compacted, and slaking tests indicate that the excavated shale will break down into a clayey material having moderate plasticity. It is possible to use the excavated shale as road armour in the dry months, but it would slake and become slippery clay in the rainy season.

When feasible, a borrow pit for sandstone aggregate can be developed, but it is likely that blasting will be required to extract the sandstone. The sandstone when excavated, crushed and screened should produce a hard, high quality aggregate base for all-weather road surfacing. However, this sandstone aggregate would be too permeable for use as final cover material.

When developing hilltop borrow sites, it is recommended that no permanent slopes be cut steeper than 1 to 1, and that final slopes higher than 40 feet be provided with 8-foot benches at each 40-foot multiple of vertical slope height. As specific operational requirements emerge during development of hilltop borrow sites, it is recommended that additional, more detailed, studies of those sites be made.

## DUST CONTROL

Dust will result primarily from dry clayey fill or cut surfaces that have been exposed for several days to the sun, wind and vehicle traffic. It is recommended that dust be controlled by daily watering of the surface in work areas, and by keeping the extent of dusty soil surfaces to a minimum.

It is unlikely that dust will be generated in fresh borrow areas when the soil still retains its in situ water content. Likewise, dust will not be a problem in freshly opened hilltop quarries. It will mainly result from repeated traffic on clayey haul roads which are not treated. Consideration should be given to oiling frequently used dirt roads or capping them with sandstone base rock from on-site borrow areas.

## LETTER RESPONSES







# State of California

GOVERNOR'S OFFICE  
OFFICE OF PLANNING AND RESEARCH  
1400 TENTH STREET  
SACRAMENTO 95814

EDMUND G. BROWN JR.  
GOVERNOR

March 15, 1976

RECEIVED  
MAR 15 1976

Mr. Adolph Martinelli, Sr. Planner  
399 Elmhurst Street  
Hayward, CA 94544

ALAMEDA COUNTY  
PLANNING DEPARTMENT

SUBJECT: SCH#76012603 - Altamont Sanitary Landfill  
Conditional Use Permit C-3010

Dear Mr. Martinelli:

This is to certify that State review of your environmental document is complete.

The results of the State review are attached. You should respond to the comments as required by the California Environmental Quality Act. You should address your responses to the commenting agency with a copy to the Clearinghouse.

Sincerely,

*William G. Kirkham*

William G. Kirkham  
Management Systems Officer  
State Clearinghouse  
(916) 445-0613

WGK/mcd

Attachment(s)


cc: Mary Schell, State Library  
Kenneth Buell, EHSB  
Loyd Forrest, ERCDC  
Albert Marino, SSWMB

**Memorandum**

To : Health and Welfare Agency  
Attention Assistant to the Secretary, Operations  
915 Capitol Mall, Room 200  
Sacramento, CA 95814

Date : February 20, 1976

Subject: SCH NO. 76012603  
Altamont Sanitary Land Fill.

From :   
Kenneth Buell, Chief  
Environmental Health Services Branch

This Department has reviewed the draft Environmental Impact Report for the proposed Altamont Sanitary Land Fill. The Oakland Scavenger Company in Alameda County proposes to establish a land fill in the foothills of the Coastal Range at the eastern end of the Livermore Valley approximately thirty miles from the City of Oakland. This site will replace several existing sites that are at or near capacity and will serve the populated areas of western Alameda County.

The report states that ground water exists in all geologic units beneath the site in sufficient quantities to supply stock and domestic wells and generally meets U.S. Public Health Service Standards for drinking water. The report points out that a number of engineering measures will have to be incorporated into the site plans to provide adequate protection to the ground and surface waters in the area from potential degradation by leachate or through gas generation. We recognize that the draft Environmental Impact Report is primarily for planning purposes rather than to provide detailed design plans; therefore, if the site receives the necessary approvals we would appreciate an opportunity to review the final design criteria when available. At that time this Department would welcome the opportunity to comment as to whether the site can be operated without adversely affecting the public health. The site would also be required to conform with this Department's solid waste standards for public health protection.

This site will provide long range disposal capability for Alameda County. It will also replace several sites that currently do not meet this Department's solid waste standards for public health protection. We believe that if the problems pointed out in the draft Environmental Impact Report regarding potential degradation to ground waters can be adequately solved that the site should be an environmental enhancement to the County of Alameda.



# Memorandum

To : 1. L. Frank Goodson  
Projects Coordinator  
Resources Agency

Date : February 17, 1976

2. Adolph Martinelli  
399 Elmhurst Street  
Hayward, CA 94544

From : **Energy Resources Conservation  
and Development Commission**  
1111 Howe Avenue  
Sacramento, 95825

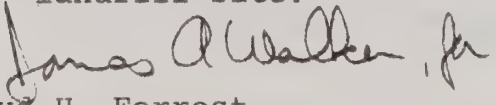
Subject: Comments on Proposed Altamont Sanitary Landfill Draft EIR  
SCH #76012603

## Specific Comments

The draft EIR presents an excellent discussion of estimated energy consumption of the various components of the proposed project including the collection vehicles, transfer station, and landfill operations. The discussion of energy consumption also extends into the area of net energy savings as a result of the resource recovery system proposed for the San Leandro transfer station.

However, energy mitigation should not be restricted to the net energy savings involved with the steel or copper industry as a result of the proposed resource recovery system, but must also be considered in internal facilities operations at the transfer station as well as operations at the landfill site. Some possible considerations in reducing the unnecessary consumption of energy at the project sites might include the following:

1. Comparison of efficiencies of alternative equipment to be used at the transfer station such as conveyors, shredders, separators, etc.
2. Most efficient method of operation of earthmovers at landfill site.
3. Discussion of energy conservation practices during construction of the transfer site and during any preparation of the landfill site.

  
Lloyd H. Forrest  
Executive Director  
(916) 322-4774

MAS:nwb

**Memorandum**

To : Honorable Claire T. Dedrick  
Secretary for Resources  
Resources Agency  
1416 Ninth Street, Room 1311  
Sacramento, CA 95814

Date : MAR 10 1976

From : **STATE SOLID WASTE MANAGEMENT BOARD**

Subject: SCH # 76012603 - Draft EIR, Altamont Class II-1 Sanitary Landfill, Alameda County

We have reviewed the draft EIR on the subject project and have the following comments:

We believe this EIR does not present adequate environmental assessment information on the landfill project and therefore, does not fulfill the purpose or intent of CEQA. Areas of the report in which we see considerable deficiencies include: Project description, existing environment, identification of environmental impacts and mitigation measures.

Project Description. The report does not contain sufficient information or detail to ascertain the setting or scope of the proposed Class II-1 disposal site.

Page 5 - Class II-1 Site. The subject landfill is proposed to be operated as a Class II-1 site which may receive Group 1 wastes as specified by the RWQCB, (Group 1 wastes could significantly impair the quality of usable waters). Those Group 1 wastes which are anticipated to be received at the site, including average monthly quantities and characteristics of specific types need to be included in the report. The specific area where Group 1 wastes will be deposited, needs to be detailed to determine possible environmental impacts. Additional data is required for hydrologic, geologic and climatic characteristics in order to evaluate the environmental impact. The dumping area used for Group 1 wastes needs to be isolated from areas which the general public may use. The method(s) of handling and disposal of the Group 1 wastes also need to be included.

Page 12 - Diagrams. These diagrams are labeled "Typical Valley Subdrain Detail" and "Typical Fill Face". Do these diagrams present specific details for the proposed project or for a typical disposal site?

Page 16 - Context of Project and Operation. The relationship with the Alameda County Solid Waste Management Plan needs to be discussed. Does the plan include the program proposed by the Oakland Scavenger Company?

Public Facilities and Services. The source of water for the proposed project has not been identified. Sufficient water should be available for drinking, dust control, truck wash down, fire control. The final EIR should discuss the source of water, and quantities necessary to meet the requirements for operation.

#### Existing Environment

Page 34 - Rodents. A large existing rodent population is cited. Possible health impacts which may accompany a large rodent population in the landfill area, need to be discussed in the Impact Section. Mitigation measures such as daily cover and vector control should be addressed in the mitigation measure section.

Page 44 - Noise. The term "relatively low" should be quantified.

Identification of Environmental Impacts and Mitigation Measures. There is a scarcity of impact data presented in the report. Quantitative data is lacking on type of impacts, areas which could be impacted, and magnitude of the impact.

Specific impact mitigation measures are not presented as being part of the proposed project. In most cases, generally described measures are only outlined as possible project features. Site specific measures, need to be developed as part of the project.

Page 64 to 67 - Geology, Soils, and Hydrology. The possible impacts of disposal of Group 1 waste have not been mentioned. The characteristics and volumes of Group 1 wastes received need to be assessed to determine possible impacts. Those possible impacts must be mitigated to comply with Title 23, Subchapter 15, Chapter 3 of the California Administrative Code.

Page 70 - Biology, Mitigation. A maintenance plan should be developed for the site and included in the mitigation measures. The maintenance plan should cover the period after site closure as well as the period when the site is in operation.

Prudence should be observed in the use of water for dust control to prevent water infiltrating the refuse fill.

We would appreciate the opportunity to make specific recommendations once a definitive engineering report has been prepared for the proposed site.

If you have any comments concerning our comments, please contact Peter L. Huff of my staff at (916) 322-3330.

Sincerely,

  
Albert A. Marino  
Executive Officer





# State of California

GOVERNOR'S OFFICE  
OFFICE OF PLANNING AND RESEARCH  
1400 TENTH STREET  
SACRAMENTO 95814

EDMUND G. BROWN JR.  
GOVERNOR

March 22, 1976

Mr. Adolph Martinelli, Sr. Planner  
399 Elmhurst Street  
Hayward, CA 94544

SUBJECT: SCH# 76012603 - Altamont Sanitary Landfill  
Conditional Use Permit C-3010

Dear Mr. Martinelli:

In a letter to you dated 3-15-76, the State Clearinghouse verified your compliance with the review procedures contained in the State Guidelines for Implementation of the California Environmental Quality Act. The attached comment was transmitted to the Clearinghouse at a later date. Please respond to it as required.

Sincerely,

William G. Kirkham  
Management Systems Officer  
State Clearinghouse

WGK/mcd

Attachment

cc: Mary Schell, State Library  
Kenneth Buell, EHSB  
Loyd Forrest, ERCDC  
Albert Marino, SSWMB  
Thomas E. Bailey, SWRCB

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ALBANY  
FL

**Memorandum**

To :

Mr. L. Frank Goodson  
Projects Coordinator  
The Resources Agency  
Resources Building, 13th Floor

Date: MAR 16 1976

In Reply Refer

To: 420: BK

From : **STATE WATER RESOURCES CONTROL BOARD**  
**DIVISION OF PLANNING AND RESEARCH**

Subject: REVIEW OF NOTICE OF INTENT SCH 76012603  
Altamont Sanitary Landfill, Conditional Use Permit, C-3010

The staff of the California Regional Water Quality Control Board, Central Valley Region, and the geologist for the State Water Resources Control Board have reviewed the proposed project. The following are their comments.


The final EIR should expand the discussion that describes how groundwater and surface water can be adequately monitored and controlled at the site. The details of daily operation and maintenance safeguards, to be worked out prior to formulation of requirements, are partially dependent on this data.

The section on water quality effects and required mitigation should be expanded substantially for those watersheds tributary to Bethany Reservoir. It is suggested that the section on leachate control and surface water facilities described in the engineer's report, prepared by Bissell and Clyde Consultants, June 1975, be added to the EIR.

The report should indicate that Fill Areas 1 and 2 do not drain to Bethany Reservoir and are separated from the California Aqueduct and Delta Mendota Canal. The 50 years required to fill these areas will provide the experience needed to determine effective protective measures for other fill areas.

Leachate collection systems, flood control facilities, and long-term maintenance required to prevent downstream degradation of water quality, as described in the engineer's report, should be discussed for all stages of site development and closure.

For further information, please contact Ray Dunham at (916) 322-4515.



THOMAS E. BAILEY  
Acting Chief

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
CENTRAL VALLEY REGION

3201 S STREET  
SACRAMENTO, CALIFORNIA 95816  
PHONE: (916) 445-0270  
452-3977



29 January 1976

RECEIVED  
FEB 2 1976

ALAMEDA COUNTY  
PLANNING DEPARTMENT

Mr. Adolph Marinelli  
Development Planning Division  
Alameda County Planning Dept.  
399 Elmhurst St.  
Hayward, CA 94544

Dear Mr. Martinelli:

Our staff has reviewed the Draft Environmental Impact Report proposed Class II Sanitary Landfill site at Altamont.

We offer the following comments with regard to protection of water quality.

1. A more specific discussion should be included to cover daily operation and maintenance safeguards relating to water quality protection.
2. A detailed discussion should be included which covers closure of the facility, continued monitoring and maintenance of water quality in the vicinity, and possible ultimate use of the closed site.
3. Page 20 of the report (drainage map) clearly shows that any surface runoff from the site could enter Bethany Reservoir and possibly even the South Bay Aqueduct. We are concerned about this possibility. This potential problem should receive serious and detailed attention in the final draft version of the EIR.

Sincerely,

WILLIAM S. JOHNSON  
Senior Engineer  
Delta Watershed

cc: Willard Slater, Dept. of Water Resources

LSP:gs



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
CENTRAL VALLEY REGION**

3201 S STREET  
SACRAMENTO, CALIFORNIA 95816  
PHONE: (916) 445-0270  
452-3977

5 March 1976

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

Attention: Mr. Adolph Martinelli

Gentlemen:

On 29 January 1976, we wrote you a letter containing comments on the Draft EIR for the proposed Altamont landfill site. A meeting was held here at the Regional Board office on 11 February 1976 with the discharger and his consultants to discuss the project and our comments. Clarifications resulting from the conference are:

1. Fill Areas 1 and 2 do not drain to the Bethany Forebay and are separated from both the California Aqueduct and the Delta Mendota Canal. Some 50 years will be required to fill these two areas.
2. Oakland Scavenger Company owns the proposed landfill site in fee and proposes to continue its present agricultural use in the future. The company acknowledges responsibility to maintain the site after closure.
3. We reviewed with the consultants their plans for monitoring and maintenance of water quality. These plans appear adequate. As field experience dictates, modifications will be made to those plans to ensure protection of water quality and prevention of nuisance.
4. An operation and maintenance plan was discussed in general. A detailed operation and maintenance program satisfactory to the Board will be worked out as part of the project report prior to any processing of the discharger's application for requirements.

The final EIR should contain that information extractable from the project report.

Sincerely,

A handwritten signature in dark ink, appearing to read 'William S. Johnson'.

WILLIAM S. JOHNSON  
Senior Engineer  
Delta Watershed

**RECEIVED**  
MAR 8 1976

ALAMEDA COUNTY  
PLANNING DEPARTMENT

WSJ:ca

# OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET • OAKLAND, CALIFORNIA 94607

Telephone 465-2911

February 27, 1976

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

Attention: Adolph Martinelli, Senior Planner  
Development Planning Division

Dear Mr. Martinelli:

Reference is made to the Draft Environmental Impact Report for the Altamont Sanitary Landfill proposed by our Company. In general we find that the Draft-EIR has been professionally researched and presented, reflecting a tremendous amount of knowledge gathered by a wide range of specialists.

We believe the drawings and technical reports submitted with our initial application provide more detailed information than could be included in the Draft-EIR. We wish to emphasize that information, and feel it responds adequately to some of the questions raised in the Draft-EIR. Specifically in regard to drainage and groundwater control, the Draft-EIR did not seem to rely as heavily on these documents as it might have.

A more precise determination has been made of the acreage within the permit boundaries. The correct acreage is 1528 acres, more or less, instead of the 1540 acres which appears in the report. Also, the title of the report by David A. Fredrickson, Ph.D., Consulting Archaeologist, was omitted from the Reference Section of the Draft-EIR.

We have several specific comments to make on this report, including comments prepared by our consultants which are made a part of this letter:

## SPECIFIC COMMENTS

1. Page 56: "Although a landfill is a Conditional Use in the Agricultural District, it is not on the list of permitted uses for preserves.<sup>41</sup> Thus a policy decision will have to be made whether to allow it as a use in these preserves."

Comment: In reference to the Altamont Site, in January 1976 the Board of Supervisors indicated that a Sanitary Landfill would be an acceptable use within an Agricultural Preserve Area.

2. Page 62: "\*Because the project site falls within the jurisdictions of both the Central Valley and San Francisco Bay Regions, it is not clear whether one (logically the Central Valley Regional because most of the project site drains to the San Joaquin Valley) or both of the Regional Boards will issue waste discharge requirements on the project."

Comment: Regarding issuance of waste discharge requirements, it is our understanding that coordination of the development of waste discharge requirements will be handled by the C.V.R.W.Q.C.B. However, action will be required by both Boards since portions of the site are located within the jurisdiction of both Boards. The procedure is accurately described on Page 98 of the Draft-EIR.

3. Page 64: "As noted by the consultants, additional water quality data is needed to establish a data baseline which includes seasonal fluctuations in natural water quality. Such data should be collected and the results provided to interested parties. It would also be valuable to plot the water quality data so that existing spatial variations in significant constituents can be identified."

Comment: Collection and evaluation of additional water quality data will be considered further and required if necessary by the Regional Water Quality Control Board. Work would begin after final authorization of the landfill is given. Fill Area 1 has an estimated 27-year capacity which will allow a long period to gather baseline information before commencing operation in other fill areas.

4. Page 64: "Monitoring points to observe ground and surface water quality also appear necessary on the drainage to Bethany Reservoir in the northeast corner of the site, in the drainage to Dyer Road and Altamont Creek in the northwest corner of the project area and on the crest of the "dry divide" along Altamont Pass Road in the southwest corner of the project area. Alluvial deposits extend across the flat divide at this location and when combined with possible seepage paths through fractured rock along the crest of the Altamont anticline, could permit groundwater subflow westward across the drainage divide into the headwaters of Altamont Creek."

Comment: The Soils, Geology and Groundwater Investigation - Altamont Landfill, by Woodward-Clyde Consultants concluded that groundwater moves from hill areas toward the stream valleys on the site following the ground contours, referenced on Page 28 of the Draft-EIR. This does not support the theory that groundwater subflow would occur westward across the drainage divide.

5. Page 65: "...some fill cells may be as much as 500 feet above the valley floors,...".



Comment: Maximum proposed depth of refuse fill is 350 feet and will occur in Fill Area 1.

6. Page 65: "...cell margins will locally encounter fractured bedrock giving rise to the opportunity for uncontrolled groundwater seepage into portions of the refuse cell, generation of leachate, and escape of contaminants through other portions of the fracture system. Also, experience with fracture permeability in sedimentary rocks of similar type and age as the Panoche formation, has demonstrated that permeable pathways persist in sandstone and conglomerate beds to greater depths than in shale.<sup>52</sup>"

Comment: Woodward-Clyde Consultants study concluded that bedrock is relatively unfractured, that no "permeable pathways" exist, and that bedrock permeability is essentially the same low value as the overlying clay soils. Reference is made to page 28 of the Draft-EIR which states that measured permeability in fractured Panoche formation rock varied between  $1.6$  to  $2.9 \times 10^{-5}$  cm/sec. Anticipated maximum permeability in fractured rock within the landfill site is probably no greater than  $10^{-4}$  cm/sec. although none of the measurements were this high.

7. Page 65: "Some leachate will be generated as a result."

Comment: This is not necessarily true. The combination of low rainfall, high evaporation rate and the tremendous absorption capacity of the paper in the refuse itself makes it highly probable that no leachate will be generated even though there may be some slight infiltration.

8. Page 65 and 66:

- "a. Operation of the project with close review and supervision by consulting engineers and engineering geologists could prevent many potential impacts.
- "b. Provision of a more comprehensive water quality monitoring program particularly in the drainages to Bethany Reservoir and Livermore Valley would help to identify as early as possible, if ground or surface water is being contaminated.
- "c. Project sponsor should specify measures that will be undertaken if the on-going monitoring program reveals that contaminants are escaping from the refuse cells. Methods for securing compliance with these measures could be included in conditions for approval of the project.
- "d. Before a refuse cell is constructed and in order to reduce the possibility of escape of contaminants through the walls of the refuse, cells, accurate profiles of permeability across enclosing hills could be obtained through exploration and testing. Where cells rise above the elevation of permeable bedrock fracture systems, a compacted earth blanket could be placed on the hillside

up to the maximum height of the fill cell. Details of blanket design and placement should be determined by geological and soils engineering consultants.

- e. In order to minimize the potential for seepage of leachate around the ends or beneath earthfill buttresses, such buttresses could be placed on unfractured shale and their abutments could be in shale. If buttresses must be located in areas underlain by sandstone, fractures could be blanketed with compacted, impervious fill or grout."
- "h. The potential effects of both carbon dioxide and methane could be substantially mitigated through the proper use of gas vents and lined barriers."

Comment: These mitigation suggestions will be the subject of investigation and establishment of operational requirements by the Central Valley Regional Water Quality Control Board, which requirements cannot be established by the Board until approval has been granted by the local governing body (California Administrative Code, Title 23, Chapter 3, Subchapter 15, Section 2552). See page 98 of Draft-EIR.

- 9. Page 82: "There may be problems of truck maneuvers because of current standards of geometrics at intersections in the interchange area, the narrower sections of Altamont Pass Road, and at the entrance to the project site."

Comment: Actual experience by Oakland Scavenger Company in July 1975 in operating a prototype truck along the route for more than a week revealed no significant problems.

- 10. Pages 84 and 85: "Fill Area 1 will not be visible from the Livermore Valley even at the projected final elevation, nor will it be seen from the Bethany Reservoir, which is a potential site for recreational development. It would be visible from the top of Brushy Peak, another potential recreational area, upon reaching an elevation of approximately 800 feet. It will also be visible from Clifton Court Forebay area in the Delta Region. After the fill reaches an elevation of 1100 feet (not expected to occur until about the year 2000), operations will be seen from the present staging area for the California Aqueduct Bicycle Path at the north end of Bathany Reservoir. The buttress beyond which the fill will be placed will be prominently visible from Altamont Pass Road. The landfill operations and fill will be mostly screened from Interstate 580 except for a few narrow view corridors through the intervening hills.

"While generally not visible from Interstate 580, they would be prominent from Altamont Pass Road. They will also be apparent from various view corridors to the northeast, east, and southeast of the project site."

Comment: A better understanding of the visual relationship of the proposed landfill to landmarks or recreation areas would result if distances were noted. The EIR conveys the impression that the landfill operation would be easily seen from various vantages, whereas most of the points mentioned are 1-1/2 to 2 miles away, a distance at which, in our judgment, many viewers would not only fail to identify what they were seeing, but would also not experience a significant adverse impact on their aesthetic senses.

A better judgment of this impact might be made by the reader if a description of the activities seen was included and a description added to compare the truck and earthmoving traffic and dust to farm equipment and plowing which now occur--as viewed from 1-1/2 to 2 miles away.

The aesthetic-visual impact of the changed landform and creation of fill faces can be experienced in Los Angeles County adjacent to major freeways. A recent issue of Waste Age magazine (Jan. 1976) presents photographs which demonstrate, we feel, that the aesthetic-visual impact is not necessarily adverse.

11. Page 88: "The visibility of such operations from various view corridors can be mitigated through preservation of ridges and knolls which obscure these views from highways and potential recreation areas."

Comment: Mitigation of the visual impact from Altamont Pass Road will be achieved by screen landscaping at the entrance to the landfill.

Fill Area 5 is virtually non-viewable by the public with the possible exception of a corridor view from Dyer Road, one mile west, or from Brushy Peak, two miles west. Again, we feel the significance of a visual impact at this distance is minor.

12. Page 88: "Another mitigating measure would be to reduce the allowable level of fill, especially where proposed fill elevations exceed 900 feet in the western portion of the site (Fill Areas 1 and 5)."

Comment: Reduction in the height of proposed fills to mitigate visual impacts significantly reduces the capacity of the site. For example, reducing the height of Fill Area 1 to a maximum elevation of 900 feet reduces the capacity of that fill area from approximately 45 million cubic yards to less than 10 million cubic yards, a reduction to less than one-fourth the capacity. Since a significant advantage of a landfill in a remote location such as this is the establishment of a long-term disposal capability with minimal visual (and other) impacts,



we feel a reduction in landfill height results in a long-term net loss to the citizens of the County. Again, we feel the significance of the visual impacts is minor and the effect of reducing the landfill height as a mitigation measure will have a long-range negative impact on the ability to dispose of solid wastes that far exceeds the relatively minor visual impact.

13. Page 108: "To the extent that total fill capacity is reduced under this alternative, pressure for recycling of refuse may be increased,"....

Comment: Reduction in landfill capacity will have no effect on pressures for recycling of refuse. The discussion in the EIR, page 96, third paragraph, speaks correctly to this point. Approval or denial of the Altamont landfill application will not hasten recycling. Waste requiring landfill will continue to be generated. Recycling will occur when the expense of such a system is supported by the affected rate payers.

14. Page 112: "If the EACDS were to accept all waste generated in the County, except that generated in Washington Township, the capacity of the site under its present County approval would be exhausted in about 6 years. Since this overall disposal of EACDS could begin as early as 1977, the site could be filled by 1983. In addition, various physical and cultural impacts similar to those enumerated for the Altamont site would result from this alternative.

"A possibility exists that the EACDS could be expanded in the future since Ralph Properties owns substantial acreage adjacent and physically similar to the existing site operation. Detailed site studies have not been performed, however, leaving unknown the suitability and potential capacity of the adjoining areas."

Comment: A "No Project" alternative is not a viable solution to Alameda County's rapidly diminishing landfill capacity. For example, in considering the impacts of disposing of all wastes at the Eastern Alameda County Disposal Site, and filling that site in about 6 years. It is not clear whether the EACDS will be available either to accept all wastes generated in the County, or to expand to adjacent acreage owned by Ralph Properties without initiating new permit applications and required environmental impact reports. A lead time of 3 to 4 years may be necessary to initiate and approve the establishment of additional landfill capacity. Such procedures would further delay the use of the EACD site and reduce the potential advantages of such an interim solution. In effect, interim use of the Eastern Alameda County Site would allow the decision on the Altamont Site to be delayed only 2 to 3 years. This is a very short time. Moreover, we have noted that the matter of increased costs that must be borne by

Alameda County Planning Department  
February 27, 1976  
Page Seven

the rate payer stemming from the high costs of making the Altamont Site application, financing investigations of the site and the "further studies" that may be deemed necessary, and operating the site to the higher standards of today, has not been covered in the Draft-EIR. In the case of the current application, they now exceed \$200,000. These costs are in addition to the increased costs of operation resulting from transportation to and from the site. They are part of the high cost of "pollution control" necessary to meet today's higher standards of public approval and environmentally sound operation. It is not reasonable to expect these costs to be repeated in the near future.

Do not hesitate to contact our office if there are any questions.

Sincerely,

OAKLAND SCAVENGER COMPANY

A handwritten signature in dark ink, appearing to read "Tom Meichtry".

Tom Meichtry, Director  
Solid Waste Management Division

TM:k

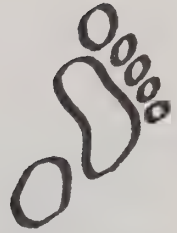
# PACE

Political Action Coalition  
for the Environment

Solid Waste Management Subcommittee  
509 Athol #3  
Oakland, Ca. 94606  
Phone: (415) 465-1479

February 25, 1976

RECEIVED  
FEB 27 1976



Mr. Dick Flynn  
Alameda County Zoning Administrator  
399 Elmhurst  
Hayward, Ca. 94544

ALAMEDA COUNTY  
PLANNING DEPARTMENT

Dear Mr. Flynn:

This in regard to the application for Conditional Use Permit (CUP) #C-3010 for operation of a 1540 acre sanitary landfill site in the Altamont hills which has been submitted by Oakland Scavenger Company. PACE would like to offer several comments and recommendations pertaining to this application:

- 1) As you know, this application cannot be viewed in isolation from the long term county-wide solid waste management planning process. Recent developments in this area deserve examination.
  - a) The Mayor's Conference is now establishing a Joint Powers Agreement agency which will assume control and direction over solid waste management in the county. This new agency will have many responsibilities, the most important of which will be to assess available data on available resource technologies and proposed facilities locations, and then to decide on what facility and site commitments will best serve the public interest.
  - b) The Bay Area Solid Waste Management study (BASWMP) also has recently taken a turn toward a more affirmative evaluation of solid waste management options. A preliminary report will be available from this task force in June 1976.
  - c) In another new development, it appears that it is highly probable that the Kaiser gravel pits in Pleasanton could be approved as a Class 3 disposal area for demolition debris, thus reducing the solid waste stream into conventional sites by up to 15 %. (More widespread adoption of the Berkeley Bottle Bill could, of course, reduce the total still more).
  - d) The Vasco Road site has been made available by its owner for disposal of the county's solid wastes for some time into the future. Although this might mean some loss of profit control to Oakland Scavenger Company, it clearly vitiates claims of an immediately impending disposal "crisis." And Oakland Scavenger's Durham Road site would provide additional assessment time for the county as a whole if its probably invalid tri-cities restriction were voided.



- 2) In light of the foregoing factors, PACE wishes to somewhat alter its formerly stated position, and to instead advocate postponement of further considerations of the CUP until the Joint Powers agency considers the options. This should occur in the very near future. It seems foolhardy and counterproductive to commit the County to a long term and costly landfill where a new evaluative body is almost formed; and just before the results of a major state financed study of the problem are available to guide decision-makers. (As already noted, several other short term options are available, thus precluding any "crisis" for some time.)
- 3) As recognized in the Draft, EIR (p. 99) unconditional, open-ended approval of a sanitary landfill site with a potential life of about 60-70 years could provide a powerful disincentive to exploring recycling systems, because the existence of the dump removes the pressing necessity to do something more productive. Land filling is increasingly an obsolete solution to the solid waste problem, and large capital investments in its perpetuation should be discouraged.
- 4) In the event that a decision is made to grant a CUP for some or all of the project, PACE would further recommend the following:
  - a) In order to assure that the site be as aesthetically unobtrusive as possible, the Draft EIR recommends a 900-foot height limit in fill Areas 1 and 5 (page 88 and 108) rather than the 1100-1200 foot limits now proposed.

This will have three beneficial effects:

- 1) elimination of many areas of visibility;
  - 2) allowing redesign of slope faces to a less steep and therefor more natural appearing gradient; and
  - 3) increase pressure for recycling. Imposition of this condition would mean that Area 1 would be full around 1985.
- b) The Draft EIR suggests two kinds of time limits which could be imposed on the CUP (page 109). Combined use of both limits would protect the public interest in assuring solid waste planning review. Therefore PACE recommends:
- 1) The CUP should expire in 1985 and/or to fill area 1 to assure a thorough re-examination of dump operations and to create pressure for incorporation of significant changes into the county solid waste plan. The year 1985 is when fill Area 1 would reach capacity if it is restricted to a 900-foot height limit, and so is a logical reappraisal time before moving operations into a new area. It is assumed that the review would begin prior to permit expiration so

as to prevent unnecessary disruption of disposal operations, and that OSC would have an option to renew the permit if the county decided this was the best course of action.

- 2) As an added safeguard, the CUP should be conditioned on a periodic update and review, to coincide with the 3-year update and review of the county solid waste plan (as recommended in the draft plan).

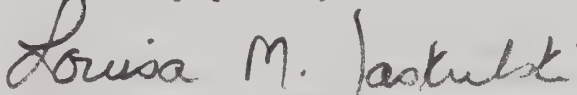
c) The CUP should stipulate that where a financially feasible energy recovery system is developed, it shall be given priority over landfill as the preferred system of solid waste disposal. This would serve to put OSC clearly on notice, in writing, of the fact that in granting the CUP the county does not thereby mean to assure private industry that the materials it collects will necessarily be transported to a facility owned by said industry.

d) Landfill sources should be limited to Alameda County (draft EIR page 110), with a stipulation that this is subject to modification if a regional solid waste system is developed.

e) Site protection provisions should be part of the CUP. These include stockpiling fertile topsoil (versus excavated inert clay subsoil and broken shale) for use as restorative soil cover (draft EIR page 68, 70); and intensive human reseeding to prevent soil erosion from wind and rain (draft EIR page 68-70). Groundwater protection measures (page 69,70) must be adequate and constantly monitored to guard against leachate problems (as exists at the Winton Avenue site).

In closing, PACE wishes to commend the Planning Department on preparing a thorough and objective Draft EIR. We will be happy to respond to any further questions you on the Board of Supervisors may have.

Sincerely yours,

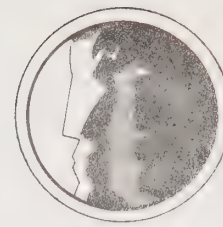


Louisa M. Jaskulski  
PACE Solid Waste Management  
Subcommittee

cc:

Members, Board of  
Supervisors  
William Fraley,  
Planning Department  
Press

## CITY OF BERKELEY



SOLID WASTE MANAGEMENT COMMISSION

(415) 644-6468

2105 GROVE STREET

BERKELEY, CALIFORNIA

94704

February 24, 1976

RECEIVED  
FEB 25 1976

Mr. Adolph Martinelli  
Development Planning Division  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

ALAMEDA COUNTY  
PLANNING DEPARTMENT

Dear Mr. Martinelli:

The Berkeley Solid Waste Management Commission urges denial of a Use Permit to Oakland Scavenger for a landfill operation in the Altamont Hills. The proposed landfill by-passes State and County plans for determining and effecting the highest and best use of solid wastes; delays resource recovery from solid wastes through diversion of capital and through inertia; and unnecessarily degrades a rural and pastoral part of the County's agricultural preserve. There are three compelling reasons for denial:

1. The projected landfill could dispose of Alameda County solid wastes for the next 60 years. Authorization of the site will mean, essentially, adoption of the Oakland Scavenger Solid Waste Management Plan by Alameda County. This plan assigns 92.4% of the wastes handled to landfill with only ferrous metals recovered.

While the Oakland Scavenger Company has prepared and taken steps to effect its plan, two other plans are near completion. The Alameda County Plan, developed over three years, recommends 67% resource recovery for the 1980's and advises using the bulk of solid waste for energy production or for compost production. The plan specifically recommends against proliferation of land disposal sites and increase of new land area used for sites. The policies and conditions of the Plan clearly oppose the continued waste of resources in landfill, and the unnecessary establishment of a new disposal site.

The Bay Area S.W.M. Project is a \$500,000 study under the State S.W.M. Board to establish priorities for the use and management of the bay area's solid wastes. The study, an in-depth examination of alternatives, including energy recovery, composting, source-separated resource recovery, and landfill will make its report to the State Legislature in June, 1976.

It is a travesty of public process for a private company to pre-empt



the planning and advisory function of two publicly responsible agencies. The Scavengers are using their considerable political clout to rush their proposal through just before acceptance of the Alameda County Plan and just before results of the State analysis and review of options is available. The Use Permit should at least be delayed until the three recommendations management of the County's solid wastes can compete on an equal footing.

2. The Summary of the Draft Environmental Impact Report on the Altamont Hills Landfill lists as an impact (p. 8), the delay that providing this facility could cause the recovery of solid wastes as a source of energy. It lists as an irreversible impact commitment of "energy resources and other non-renewable construction materials" to a landfill.

In the first place, the wastes committed include millions of tons of material that can also be used for fiber, soil amendment, and many manufacturing uses in addition to construction.

Secondly, the delay that a new long-term landfill could cause to admittedly more constructive uses of solid wastes is profoundly significant. The Oakland Scavenger Company, through its exclusive franchises, operates with the monopoly status of a public utility, without the direct public control to which other public utilities are subject. Its fees are guaranteed by the 12 jurisdictions where it operates. Those fees paid for purchasing the Altamont site and will pay for developing the site for landfill. As the Summary Draft EIR implies, capital provided for the Altamont Hills development is deleted capital available for resource recovery.

The landfill's most significant block to establishing an alternative system of waste management will be inertia. The imminent closing of near-by fills sparked State passage of SB-5, preparation of the County plans, costly State studies of alternative systems in Southern California and the bay region. With a 60-year dump site approved and running, bickering, indecision, red-tape, and the monkey-wrenches thrown in by the scavenger industry could delay large scale establishment of alternatives in the County for the foreseeable future. A premise of SB-5 and the County and State studies is that lower out-of-pocket costs do not necessarily mean good economics. But if a system which means lower out-of-pocket costs is already established, it is almost impossible for any given jurisdiction or group of jurisdictions, to adopt an alternative without a "crisis" to spur them on. Once Altamont Hills is running, political realities work to keep it running. The million dollar public plans will be of academic interest only.

3. Although the draft EIR dismisses the aesthetic and biological characteristics of the Altamont site as negligible, there can be a difference of opinion on this matter. A critical consideration is whether or not destruction of these aesthetic and biological characteristics is in fact necessary.

The Summary Draft EIR does not consider the disruption to wildlife of landfill operations on the site important enough to include. The Draft EIR gives the basis for a dissenting opinion. Although the area has been overgrazed so that the significant mammalian populations are burrowing rodents, these rodents in turn

Mr. Adolph Martinelli

February 24, 1976

support what the Draft EIR terms the "noteworthy" presence of a large variety of resident and wintering hawks, kites, and eagles. These predators do not nest on the area, but use it as a hunting ground. This is the key to the ecological or environmental significance of this 1600 site in the rural area of Alameda County. The site is part of an extensive tract of land, until now unviolated by unsuitable activity. Abstraction of this area for a mechanized, industrialized use spoils far more than the site itself. It spoils the context.

The massive intrusion of great tiered mounds will destroy the slowly evolved harmonious continuity of rounded hills. The massive intrusion of the enterprise itself will greatly injure the capacity of the entire area to support those rare and marvellous animals that take many square miles of open land for sustenance. In the primary sense of a geo-physical resource, air, water, land, this region is unviolated. Reservation for agriculture, or unstructured recreation maintains it as a resource. The intrusion of the projected dump significantly degrades it.

If the degradation is in fact necessary, it might be worth it. For the people of the region, living near a harmonious landscape with an elaborate and various biota is a privilege, whereas divesting themselves of their waste products is a necessity. As the Summary EIR in part points out, however, the Altamont Landfill is not the only possible disposal site for County wastes. At current rates of County waste production and disposal, the Vasco Road site, already in use, would last for six more years. Possible use of the existing site in Fremont would increase capacity for two years.

This capacity certainly provides adequate lead time for general conversion in the County to an economically and environmentally more desirable system of waste management. The time frames developed by the Alameda County S.W.M. Advisory and Technical Committees, and precedents all over the country, suggest that transfer to alternative systems can be effected within the requisite period.

Very substantial reduction in the current disposal rate for Class II sites could be effected almost immediately. The Kaiser gravel pits have been established as a suitable site for Class III wastes, that is, inert materials such as demolition wastes. These materials now range between 15 and 20% by weight of County wastes. (Table II - 5 Draft Alameda County S.W.M. Plan; Table 2 - 17, Chiu-Diaz Report, Berkeley.) Between 1970 and 1975, municipal wastes collected in Berkeley have declined from 48,000 tons per year to 38,000 tons per year - a reduction of over 20%. The change is credited both to recycling centers and to reduction in waste generated. The City of Berkeley has now set up low-capital waste reduction and source separation measures (newsprint recycling, container re-use ordinance, composting of plant debris) which will again reduce the municipal wastes collected by about 20%, and the S.W. Commission is working on an expanded program.

In the past month, the City of Berkeley has also received two requests to take all of its municipally collected solid wastes for energy recovery - one from a private and one from a public agency.

With this kind of activity achieved and possible, there is no good reason for opening a large new landfill in Alameda County. Measures like the ones described can be implemented within six months to three years. They could greatly prolong the

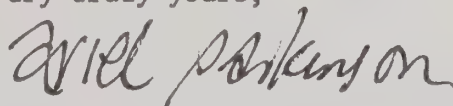
Mr. Adolph Martinelli

February 24, 1976

capacity of the existing landfills. More comprehensive systems, like EBRRS and BAY DELTA will be compared and evaluated by the B.A.S.W.M.P. study. Both proposals are serious and well supported. There is an excellent chance that one or both will be effected by the early 1980's. The residue for disposal from both systems is inert and therefore suitable for Class III sites, for some of which, like gravel pits, filling to grade can be an improvement.

A final look to the future. If the Use Permit for the Altamont Hills site is denied, the bay area will definitely acquire major resource recovery facilities within the next ten years. If the Permit is approved, the Altamont Landfill will probably run for at least half a century. The bulk of solid wastes will be disposed of by landfill, and minor resource recovery will occur. At this time, materials shortages will probably make the mining of landfills economically viable. The mechanized, industrialized intrusion on another part of Alameda's agricultural preserve will be intensified and prolonged.

Very truly yours,



Ariel Parkinson, President  
Berkeley Solid Waste  
Management Commission

AP:jr





DEPARTMENT OF THE ARMY  
SAN FRANCISCO DISTRICT, CORPS OF ENGINEERS  
100 McALLISTER STREET  
SAN FRANCISCO, CALIFORNIA 94102

SPNED-E

30 January 1976

Mr. Adolph Martinelli, Senior Planner  
Development Planning Division  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

RECEIVED  
JAN 31 1976

ALAMEDA COUNTY  
PLANNING DEPARTMENT

Dear Mr. Martinelli:

Reference is made to your letter of 9 January 1976 forwarding the Draft EIR for the Altamont Sanitary Landfill, Conditional Use Permit C-3010.

It appears that portions of the proposed activity may require authorization under future phases of the Corps of Engineers Section 404 Permit Program. Inclosed please find an information sheet which explains this program. If you require additional information on this question, please contact Mr. Hans Lamm of our Regulatory Functions Branch at 415-556-5966.

By copy of this letter we are informing the Oakland Scavenger Company of our jurisdiction in the project area and will forward a copy of our information sheet explaining the Corps of Engineers Section 404 Permit Program.

This office appreciates the opportunity to review your report and our additional comments are attached.

Sincerely yours,

*R. C. Riddle*

R. C. RIDDLE

Acting Chief, Engineering Division

2 Inclosures  
As stated

Copy Furnished:

Oakland Scavenger Company  
2601 Peralta  
Oakland, CA 94607

SAN FRANCISCO DISTRICT COMMENTS  
DRAFT ENVIRONMENTAL IMPACT REPORT  
ALTAMONT SANITARY LANDFILL  
ALTAMONT, ALAMEDA COUNTY, CALIFORNIA

1. A minor inconsistency was found on pages 12 and 13 of the DEIR. The details presented on page 12 indicate that the landfill will be covered with six to seven feet of earth. Two statements on page 13 indicate that the cover on the fill will be two feet. The amount of final cover on the fill should be clarified.

2. Our review of the report did not encounter a discussion of the erosion of the landfill surface by surface runoff. It might be expected that some erosion of the surface could occur during periods of intense rainfall. Erosion of the landfill could cause sedimentation to occur downstream of the project site. The EIR should discuss the potential for erosion and downstream sedimentation, and the means which may be used to mitigate this potential impact. The details of the plan, presented on page 12, indicate that some measures would be incorporated into the project. The description and presentation of Details "A" and "B", alluded to on page 12, might suffice.

3. The report seems to adequately recognize and address the possible impacts of the proposed project on the quality of surface water and ground water. It is recognized that the California Regional Water Quality Control Boards for the Central Valley and San Francisco Bay Regions may ultimately dictate the design of the project with respect to water quality preservation aspects. Since it may be too late to easily correct a ground water quality problem which could occur during the life of the landfill project, though, it is suggested that serious consideration be given to covering the area to be covered by the landfill with an impervious blanket, as suggested on page 66 of the DEIR, to effectively eliminate potential problems. The EIR should also present mitigative measures which might be implemented should positive protection not be provided and ground water quality degradation occur. Such mitigative measures might include the collection, storage, and treatment of degraded waters prior to their return to the environment.



## City of Fremont

City Government Building  
Fremont, California 94538

February 24, 1976

RECEIVED

Mr. Adolph Martinelli, Senior Planner  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

ALAMEDA COUNTY  
PLANNING DEPARTMENT

RE: Draft EIR: Altamont Sanitary Landfill

Dear Mr. Martinelli:

Our review of the draft Environmental Impact Report for the Altamont Sanitary Landfill has found no direct environmental impact affecting the City of Fremont. The report does, however, raise issues of solid waste disposal which have both local and County-wide significance. My response is directed to those issues.

The City of Fremont has approved the proposed County Solid Waste Management Plan, thereby endorsing the concept of resource recovery as the major long-term method of solid waste management. We are concerned that development of a new landfill with a very large capacity might lessen the commitment of various bodies to initiate resource recovery techniques. On the other hand, we believe that development of a moderate amount of landfill capacity at Altamont is necessary. This would provide a sound disposal site as replacement for those facilities now rapidly nearing exhaustion. Such capacity is needed until economically feasible and environmentally sound resource recovery facilities can be put "on line" to serve those areas about to "run out" of available disposal facilities. Limiting the fill to a lower ultimate level, as suggested in the EIR project alternatives, will allow for disposal of large volumes of waste in the near future and for the long-term disposal of nonrecoverable materials as the resource recovery programs are implemented. Approval of the project with a 900-foot fill limit as described in VIII.C.2 (page 108) would be consistent with these concerns.

CF

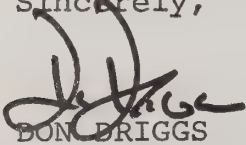


Mr. Adolph Martinelli, Senior Planner  
Draft EIR: Altamont Sanitary Landfill

February 24, 1976  
Page 2

Thank you for the opportunity to comment on the draft Environmental Impact Report. Please contact me if you have any further questions concerning our comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Don Briggs", is written over the printed name.

DON BRIGGS  
City Manager  
(415) 796-3438

DD:vs

## ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

## INTER-DEPARTMENT COMMUNICATION

DATE : FEBRUARY 11, 1976

TO : MR. ADOLPH MARTINELLI, SENIOR PLANNER  
ALAMEDA COUNTY PLANNING DEPARTMENT

FROM : PAUL E. LANFERMAN, ENGINEER-MANAGER  
ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

SUBJECT: COMMENTS ON DRAFT EIR - ALTAMONT SANITARY LANDFILL

Thank you for the opportunity to review the subject EIR. The following comments are submitted to assist in the complete evaluation and disclosure of project impacts.

Section V.A.1. which discusses hydrologic impacts, should consider the impact of the project on surface water hydrology of the site. Large amounts of fill proposed for canyons on the site would substantially alter the manner in which stormwater concentrates and drains in the area. Additionally, changes in slopes and ground surface permeability would affect the total quantity of surface runoff from the site.

Unless adequate drainage facilities are provided in the fill and borrow areas to accommodate stormwater runoff, serious erosion, siltation, and water quality degradation could occur. The illustration on page 12 indicates drainage swales to be located on the face of the fill; however, Details "A" and "B" are missing from the illustration and, therefore, the drainage provisions cannot be evaluated.

  
PAUL E. LANFERMAN  
ENGINEER-MANAGER

PEL:SWM:dla

## CITIZENS ADVISORY COUNCIL

EDEN DISTRICT HEALTH CARE SERVICES AGENCY

15001 FOOTHILL BLVD.  
SAN LEANDRO, CALIFORNIA 94578  
~~380-880-2800~~  
577-1591

March 9, 1976

RECEIVED  
MAR 10 1976

ALAMEDA COUNTY  
PLANNING DEPARTMENT

Mr. Richard Flynn  
Zoning Administrator  
Alameda County  
399 Elmhurst Street  
Hayward, Ca 94544

Dear Mr. Flynn:

Re: Altamont Sanitary Landfill Draft Environmental  
Impact Report

The Coordinating Committee of the Eden Health Advisory Council has reviewed the Draft Environmental Impact Report for the Sanitary Landfill, Conditional Use Permit C-3010, a proposal by the Oakland Scavenger Company to permit construction and operation of a sanitary landfill which would function as a County-wide solid waste disposal operation. It would be located on a 1,540 acre site in the Altamont Hills in the northeastern portion of the unincorporated Alameda County.

With the knowledge that all sanitary landfill sites in the Central Metropolitan and Eden Planning Units (except Berkeley) will be closed by 1977, it is important that adequate provision be made for future disposal of that portion of our metropolitan wastes which cannot be recovered.

Our interest is primarily on the impact of the proposal on water quality. We believe that methods for securing compliance with the following measures should be included in conditions for approval:

1. There must be close review and supervision by consulting engineers and engineering geologists.
2. A comprehensive water quality monitoring program particularly in the drainage to Bethany Reservoir and Livermore Valley must be provided.
3. If the monitoring program reveals that contaminants are escaping the refuse cells, the project sponsors must specify measures to be undertaken to contain these contaminants.



Because of the possibility of unforeseen problems such as unexpected contamination of ground waters, we advocate periodic review of the Altamont Landfill every three years. This review of a major element in the County's solid waste management scheme would take into consideration the project's relationship to the County Solid Waste Management Plan as the latter is revised.

We also ask that the permit be limited to ten years and fill for only Area I.

Data from California Employment and Payrolls by the California Department of Human Development, January-March, 1972 indicates there are 811 companies in hazardous waste generating industries in Alameda County. These were identified in a State Public Health Department study on hazardous waste. Land disposal of the industrial waste products, by ordinance, must occur in a Class I disposal site. We know, however, that hazardous wastes do find their way into Class II sites. We are very concerned about the need to monitor toxic and hazardous waste dumping into this proposed Altamont landfill.

Sincerely,



Bruce H. Carter, D.D.S., Chairman  
Eden Health Advisory Council

BC/rm

COPY - TO EIR (ADOLPH)

EAST BAY CHAPTER OF THE CALIFORNIA COUNCIL  
OF CIVIL ENGINEERS AND LAND SURVEYORS

## PRESIDENT

Robert J. Silva

## VICE-PRESIDENT

Robert L. Floyd

## SECRETARY

John A. Wollman

## TREASURER

Gary Bliss

## OFFICE OF THE SECRETARY:

200 Gregory Lane

Pleasant Hill, California 94523

Phone 685-1500

## OFFICE OF THE TREASURER:

3264 Buskirk Ave.

Pleasant Hill, California 94523

Phone 939-0511

February 25, 1976

Alameda County Planning Dept.  
399 Elmhurst Street  
Hayward, CA 94544

ATTN: Adolph Martinelli

Gentlemen:

The East Bay Chapter, California Council of Civil Engineers and Land Surveyors, appreciated the opportunity to review the draft for the Altamont Sanitary Landfill Conditional Use Permit No. 3010. We feel that the report is of high professional caliber and Adolph Martinelli and his staff are to be complimented.

We feel that the project meets the Solid Waste Management requirements of Alameda County and recommend approval of the Use Permit Application.

Very truly yours,  
Murray-McCormick, Inc.

*Robert J. Silva /mw*  
Robert J. Silva  
President, East Bay Chapter  
C.C.C.E.L.S.

RS/jw

Enclosure

RECEIVED  
MAR 1 1976

ALAMEDA COUNTY  
PLANNING DEPARTMENT



# CITY of LIVERMORE

2250 FIRST STREET • LIVERMORE, CA 94550 • (415) 447-2100

March 11, 1976

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, Ca. 94544

Attention: Mr. Adolph Martinelli, Sr. Planner  
Development Planning Division

RECEIVED  
ALAMEDA COUNTY  
PLANNING DEPARTMENT

Gentlemen:

At its meetings of February 24 and March 9, 1976, the Planning Commission considered your referral of the E.I.R. for the proposed Altamont Pass Road Refuse Disposal Site.

By unanimous vote, the Planning Commission on March 9, 1976, did direct that the following concerns be brought to your attention:

- 1) That the report does not reflect adequate concern for possible groundwater pollution and its effect on Bethany Reservoir to the northeast.
- 2) Although there were alternate proposals mentioned in the E.I.R. there was not adequate consideration given to selection of alternate sites within the general area.
- 3) Possibility that sufficient attention was not given to the air quality impact of additional truck traffic generation on I-580.
- 4) Serious consideration should be given to locating the East Bay transfer site in proximity to a railroad to permit rail transportation to subject site rather than truck transportation.

Thank you for referring this matter to the Livermore Planning Commission.

Very truly yours,

  
George R. Musso, Secretary  
LIVERMORE PLANNING COMMISSION

GRM:gf





# Association of Bay Area Governments

Hotel Claremont • Berkeley, California 94705 • (415) 841-9730

March 9, 1976

Mr. Adolph Martinelli, Senior Planner  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544



Subject: Draft Environmental Impact Report - Altamont Sanitary Landfill

Dear Mr. Martinelli :

We appreciate the opportunity to review the Draft Environmental Impact Report for the Altamont Sanitary Landfill. The following comments relate to the solid waste management planning process in Alameda County and makes two recommendations:

1. That time be allowed for the formation of an intergovernmental management agency to implement the recently completed Solid Waste Management Plan for Alameda County;
2. That additional information be developed before a long-term commitment is made for the disposal of Alameda County's waste.

## Formation of an Intergovernmental Agency to Implement the County Solid Waste Plan

The County Planning Department, assisted by an advisory committee of representatives of local governments, special districts, private operators and citizens, and technical advisory committee of local agency staff and industry representatives, has recently recommended a comprehensive plan for the management of Alameda County's waste. The plan was prepared according to policies and guidelines for county-wide plans set forth by the State Solid Waste Management Board. While the plan does not propose to meet the State's 1980 goal of 25 percent per capita reduction of waste going to landfills, it does envision establishment of resource recovery facilities in the 1980-90 period that would result in a 67 percent of reduction of waste disposed to land. Our concern is that the integrity of the objectives of the county plan relating to recycling and recovery of resources will be compromised by commitment to a landfill site that will accommodate the county's waste well beyond the long-range period of the county plan (to 2005) with only minimal resources recovery (8 percent).

While it is true that the county plan does not yet have the necessary concurrence of the cities in the county, it is our understanding that it is not the resource conservation and recovery objectives that are in question, but rather the form of the intergovernmental/private arrangements whereby the county, the

Mr. Adolph Martinelli  
 March 9, 1976  
 Page two

cities, affected special districts and private operators will assume ongoing responsibility for planning, policy making, administration, financing, enforcement and operation.

Since a number of meetings have already been held and steps are currently being taken to form a Joint Exercise of Powers agency to assume these responsibilities, it would seem advisable to delay commitment to a long-term solution before the management agency has been formed and policies and objectives have been adopted as a basis for evaluation of proposed projects.

#### Additional Information Needed

The DEIR points out certain questions that remain unanswered before an informed decision can be made upon this application :

- a. Whether a landfill is a compatible use under the Williamson Act;
- b. Whether a stipulation in the contract for the operator to limit the landfill to dispose the Alameda County waste in order to mitigate adverse impacts would be contrary to State policy that calls for elimination of barriers to the interjurisdictional flow of waste (presumably this does not mean solely within a county); and
- c. What resource recovery goals and policies will be adopted as the basis of the county-wide plan.

These unresolved issues plus the fact that information on alternative resource recovery technologies will soon become available for studies being conducted by the State Solid Waste Management Board, suggest consideration of an interim solution--for a one- to two-year period. To this end, it is recommended that the DEIR be expanded to examine: a) the extent of the "emergency", by definitive analysis of capacity available in existing landfills in Alameda County, including the possibility of the establishment of a Class III site in the Kaiser gravel pits in Pleasanton to receive construction and demolition debris, thus releasing capacity at Class II landfills; b) whether the East Alameda County Disposal Site (Vasco Road) is a feasible alternative, by a reconnaissance of the physical environment of that locatin to provide the same level of detail as is contained in the DEIR for the Altamont Hills site.

It should be noted that these comments are based on a technical review by the staff of the Associatin of Bay Area Governments and should in no way be construed as an indication of Association support or non-support of the project. If you have any questions about these comments, please call Yvonne San Jule at ABAG offices (841-9730).

Sincerely,

  
 Donald J. Skinner  
 Assistant Planning Director

## EAST BAY BICYCLE COALITION

P. O. Box 23934

Oakland, CA 94623

February 27, 1976

Mr. William H. Fraley, Director  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

RECEIVED  
FEB 1 1976ALAMEDA COUNTY  
PLANNING DEPARTMENT

Dear Mr. Fraley:

We have reviewed the Draft Environmental Impact Report on the Altamont Sanitary Landfill, which recently came to our attention. We are concerned about the impact on Altamont Pass Road.

The DEIR cites the following facts:

- (1) Transfer vehicle (maximum size trucks) trips are estimated at 240 per day (15 per hour in each direction assuming 8-hour day)
- (2) Altamont Pass Road roadway width is 22 feet (substandard) to 24 feet
- (3) Altamont Pass Road has unimproved shoulders
- (4) Due to curvilinear alignment it has several lengthy no passing zones

The following facts are not cited:

- (1) Altamont Pass Road is a major bicycle route
- (2) It provides access to the bicycle route along the California Aquaduct
- (3) The cross-section of Altamont Pass Road is deficient in relation to contemporary standards
- (4) During the times of haul operations, maximum size trucks will constitute the majority of traffic



Mr. William H. Fraley  
February 27, 1976  
Page 2

We believe the EIR should include the following:

- (1) To what extent will the change in character of the traffic deter bicyclists from using Altamont Pass Road?
- (2) For those who are not deterred discuss the extent of increased hazard
- (3) What mitigation measures are proposed?
- (4) In view of the drastically changed character of traffic on Altamont Pass Road, what consideration is being given to upgrade the cross-section to contemporary standards?

Very truly yours,

  
John L. Carroll, Chairman

## COMMENTS TO LETTER RESPONSES





## COMMENTS TO LETTER RESPONSES

## A. Comments on responses through the State Clearinghouse:

1. The response of the Health and Welfare Agency is acknowledged. We concur in the Agency's position that the appropriate time for its detailed review of the project is at the final design stage. Regarding the last paragraph of the Agency's comments: while categorizing the project as an "environmental enhancement" may be a bit overzealous, we agree that its environmental impacts appear less than those of existing waste disposal sites along the bay plain.
2. The response of the Energy Resources Conservation and Development Commission is acknowledged. The energy discussion in the draft EIR focussed on the project concept because it is at that level where decisions will have the greatest effect on energy resources. The choice of alternative types of machinery and their efficient operation can conserve minimal amounts of energy compared with the decision not to recover certain resources or to use solid waste as a fuel. Furthermore, collection and potential operation of the transfer station are areas which lie outside the scope of regulation under the project application, and consequently the Draft EIR. The very size of the landfill operation will allow use of a variety of specialized machinery. Presumably, energy efficiencies would be realized through the use of equipment for the purpose for which it was designed. Since fuel expenditures account for approximately 90% of operating costs (Sanitary Landfill Design and Operation, U.S. E.P.A., 1972) it will be in the interest of Oakland Scavenger Company to purchase efficient machines and operate them in an energy-efficient manner. Proper maintenance of machinery is also essential for energy conservation.
3. The response of the State Solid Waste Management Board is acknowledged. It appears that their comments are based on lack of understanding of the Regional Water Quality Control Board classification system for landfill sites. A class II-1 site may not accept Group I wastes; as the chart in the Draft EIR on Page 7 clearly shows, all Class II sites are suitable for, and regulated to receive only Groups 2 and 3 wastes. The number following the Roman numeral does not refer to waste grouping (those are listed on Page 6) but to site characteristics.

A difficulty arises in commenting upon the Board's letter, since their comments are based on the erroneous assumption that the Altamont site would accept Group I wastes, which include highly toxic materials and for which extraordinary care must be taken with disposal. The necessity for a response to the Board's

comments concerning Pages 5 and 64-67 is clearly obviated, and the severity of many other comments is called into question. For example, the Board maintains that the Draft EIR does not contain sufficient information or detail to ascertain the setting or scope of the disposal site. The criticism possibly may have been well-taken if the site was to accept Group 1 wastes; but since it will not, it is difficult to respond without clarification as to what the Board feels was left out of the descriptive sections which comprise the first 63 pages of the report.

Page 12 - Diagrams. The diagrams represent specific details for the proposed project.

Page 16 - Context of Project and Operations. This is in the Project Description section; the relationship of the Oakland Scavenger Company's proposal to the Alameda County Solid Waste Management Plan is discussed in the Impacts on Public Plans and Policies section, Pages 95 to 97. The County Plan is discussed on Pages 57-60.

Public Facilities and Services. Page 81 contains a discussion of the sources of water for the project, the uses to which it would be put, and quantities necessary to meet the requirements for operation.

Page 34 - Rodents. The potential health impacts associated with rodents, and the possibility of the necessity of rodent control, are discussed on Page 68 of the draft EIR. Daily cover is, by definition, a part of a sanitary landfill.

Page 44 - Noise. No measurements of noise levels have been taken at the site. The EIR notes that the noise level at the site is similar to other rural areas; this would indicate that it might be about 43-44 dB (1dn system).

Identification of Environmental Impacts and Mitigation Measures. It is difficult to understand the statement that "there is a scarcity of impact data presented in the report." Perhaps that conclusion was based on the wrong assumption that Group 1 wastes would be received at the site. Pages 64 through 67 present specific mitigation measures for geological, soils, and hydrological impacts. Pages 67 through 99 describe other impacts and discuss specific mitigation measures. The Alternative section, Pages 100-113, discusses the impacts of various alternatives to the project, including alternative mitigation measures, and culminates in a discussion (Page 110) of periodic regulatory public review, and time and height (and thus volume) limits for the operation. The purpose of an EIR, as stated in CEQA, "is to provide public agencies with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which any adverse effects of such a project may be minimized; and to suggest

alternatives to such a project." (P.R.C., Ch. 2.5, Section 21061). The EIR is an informational document which should be readily understandable to the decision-maker and general public. As such, it is not the purpose of an EIR to develop site specific mitigation measures as "part of the project." This is the responsibility of the project engineers, geologists and other registered professionals responsible for project design. Many of the site specific features are already developed in the engineering report and other technical documents which are part of the project application and referenced in the EIR.

Page 70 - Biology, Mitigation. A maintenance plan for restoration of the site after closure is presented in Mitigation measure #1 on Page 70.

4. The response of the State Water Resources Control Board is acknowledged. The first part of Volume Two, the Addendum, supplements data in the Draft EIR discussing leachate collection facilities, flood control facilities, mitigation of impacts and long-term maintenance.

As illustrated on Pages 4 and 5 of Volume Two, Fill Areas 1 and 2 do not drain to Bethany Reservoir and are separated from the California Aqueduct and Delta Mendota Canal.

Development of a specific program of water quality monitoring and control is reserved by statute to the State Water Quality Control Board. Potential locations for groundwater monitoring stations were discussed in Paragraph 3, Page 64 of the Draft EIR. Wells which might be used for water quality monitoring exist at most of these locations. Stations for monitoring surface water quality could be established on all active drainage channels near the points where they leave the property if such a program were desired by the State. A summary of existing water quality data is presented on Pages 28-30 of the Draft EIR and available analytical data is included in Appendices A, B, and C to the Draft EIR. Water Quality Control Board personnel indicated during an informal meeting on March 11, 1976, that the existing data provides sufficient information for the beginning of a long-term quality monitoring program. It was the sense of the meeting that future sampling should be undertaken on an at least annual basis but development of a specific program is under the jurisdiction of the Central Valley Region Water Quality Control Board.

Anticipated impacts on water quality in the Bethany Reservoir watershed can best be determined over the years as filling of Areas 1 and 2 (which do not drain to Bethany) provides specific data showing effects of fill cells on groundwater.

A bill is before the State Legislature which would require the establishment of trust funds to provide for closure of waste disposal facilities and establish a scheduling procedure for affecting closures. Passage of such legislation would be greatly beneficial in reducing long-term environmental impacts resulting



from abandoned sanitary landfills. As with monitoring programs, development of specific provisions relating to water quality maintenance after closure of sanitary landfills is currently under the jurisdiction of the State Water Quality Control Board.

- B. The two letters from the California Regional Water Quality Control Board - Central Valley Region (CVRWQCB) are acknowledged. The letter of March 5, 1976, appears to allay most of the concerns brought up in the January 29, 1976, letter. In the period between the two responses, the Board staff had the opportunity to review the design and technical data prepared by applicant's consultants. Some of this data has been incorporated into the first part of Volume Two, the Addendum to the Draft EIR. The response to the State Water Resources Control Board (A.4., above) is also applicable to issues raised by the regional board.
- C. The response of the Oakland Scavenger Company is acknowledged. Included in the first part of Volume II are references to the technical reports to which Oakland Scavenger Company refers in the second paragraph, including duplication of the recommendations relating to soils, geology and groundwater by Woodward-Clyde Consultants. The updated project acreage, ± 1,528 acres, is noted. The title of the report by the consulting archaeologist is An Archaeological Reconnaissance of the Proposed Altamont Landfill Site, Alameda County, California.

Responses to numbered Oakland Scavenger Company comments follow:

- 1, 2. Oakland Scavenger Company comments are correct.
- 3, 4, 6, 7, 8. The report by Woodward-Clyde Consultants was reviewed by the County Engineering Geologist as part of the EIR preparation process. Pertinent data has been incorporated in the EIR and comments contained in the physical impacts section of the EIR (Pages 63-67) reflect the results of the County Engineering Geologist's review. The Woodward-Clyde report does indicate that potential environmental impacts can be mitigated. However, review indicates that some measures beyond those outlines in the technical reports may be necessary to achieve the highest reasonable level of mitigation. As discussed previously, details of monitoring systems and mitigation measures to be adopted are under the jurisdiction of the Central Valley Region Water Quality Control Board.

The first part of Volume Two, the Addendum to the Draft EIR, presents supplementary data pertinent to these issues.

- 5. Oakland Scavenger Company comment pertaining to depth of refuse fill is correct.



9. Problems may occur in full operation, when more than one truck is involved in maneuvers. Operation of one prototype truck does not preclude the problems referred to in the draft EIR.
10. Activities at the landfill site will involve concentrated activity and larger machinery of a scale which bears little relation to farm operations in the vicinity. Such machinery includes the 60-foot long transfer vehicles which will be unloading waste at the base of the working fill face, bulldozers, scrapers, landfill compactors, a motorgrader to grade roads, and water trucks. The size of this machinery and the extent of activity, while admittedly not necessarily recognizable from 1-1/2 to 2 miles away as a landfill operation, will clearly be of a totally different character than farm plowing. Furthermore, the project activities will take place at elevations and on topography on which farm machinery normally does not operate. While aesthetic perceptions depend to some degree on the observer, we take exception to the claim that the photos in Waste Age Magazine demonstrate positive visual impacts. The cover photo and the picture on Page 15 depict a massive artificial transformation of the natural landscape. While some may perceive some aesthetic value in the new landscape, we doubt that most people would regard it as much more than a scar. The issue of Waste Age Magazine is available in the project file for review as part of the project record.
11. Behind the entrance to the landfill from Altamont Pass Road will be clearly artificial terraced fill face that eventually will extend vertically over 250 feet. Screen landscaping may soften the appearance of the slope. No screening is apparently being considered for the other terraced fill face visible from Altamont Pass Road associated with Fill Area 2.

We do not concur with the opinion of Oakland Scavenger Company that the significance of the visual impacts of the project is minor. While the project vicinity is not pristine, it is relatively natural and open, intruded upon by few discordant uses. A sanitary landfill such as proposed is undeniably a massive, large-scale operation. In the context of non-intensive agriculture and purely open space uses, the aesthetic impact of the project cannot be discounted.

12. It is recognized that lowered height limits significantly reduce landfill capacity; the discussion on Page 108 of the Draft EIR speaks to this point. Reduction of fill height is suggested as possible mitigation of one identified impact. Adoption of any mitigation measures must be weighed against the project objectives, and possible over-riding considerations. Height limits discussed would leave sufficient capacity until at least 1985; at that time, review of project aesthetics and landfill requirements may be made. It should be noted that lowering of permitted fill height serves to mitigate other impacts as well, as discussed on Page 108 of the Draft EIR.

13. The discussion on Page 96 indicates that reduction in landfill capacity may reduce pressures for recycling. The decision whether to proceed with serious recycling alternatives does not necessarily rest upon the economics involved. A public decision may be made to underwrite enough of the initial capital investment publicly to commence large-scale recycling regardless of the economics if the public interest served would justify so doing. While some landfill capacity will be required under any amount of presently feasible recycling alternative, if the Oakland Scavenger Company project is approved as proposed, inertia, large capital investments in the landfill operation, transfer equipment, and the removal of a "crisis situation" in waste disposal would all work to retard a commitment to recycling.
14. The "no project" alternative described in the Draft EIR is not limited to discussion of the EACDS site; the Fremont site (now restricted to Washington Township wastes, in apparent violation of State policy) could conceivably be opened up to the rest of the County's waste. As noted on Page 113, the two sites would provide landfill capacity for 8 years at these existing, approved sites. Full public commitment to recycling, source reduction, etc., could prolong the life of these landfills, although it is probably doubtful that significant reductions in the overall waste stream could take place in such a relatively short time. However, the EACDS site could be expanded to accommodate a limited amount of additional waste, perhaps a few years worth, if recycling objectives were not being met on schedule. While full environmental review similar to this analysis for the Oakland Scavenger Company project would certainly be conducted for such EACDS expansion, eight years of "breathing space" would be sufficient time for such review to occur. On the other hand, establishment of a new site to accommodate a few years of landfill is not justifiable.

The overall problem is that the alternative outlined above depends on a lot of "ifs." The Altamont landfill may pose a more secure alternative if in conjunction with a clear commitment to resource recovery, subject to periodic public review to determine recycling feasibility. Such a commitment, if and when taken, would not make Altamont a "wasted" site but would simply extend its life by limiting received refuse to that which cannot be recovered.

\$200,000 does not appear to be a large amount to spend to review the advisability of a 70-year commitment with a capital investment cost of \$14.3 million.

D. The response of the Political Action Coalition for the Environment (PACE) is acknowledged. Responses to their comments follow:

- 1.a.b. It is recognized that various plans for solid waste disposal for the Bay Area are being formulated. At current technology, however, no combination of programs exists which will eliminate a significant component of the waste stream which cannot be recovered. Sanitary landfills represent the best method of disposing of these wastes that is now known or is likely to be known in the foreseeable future. Furthermore, the preparation of regional plans begs the question of the problem of limited remaining landfill capacity for Alameda County. Although additional capacity does exist (see C.14. above, response to Oakland Scavenger Company), the lead time necessary to expand EACDS or commence a Kaiser operation may be considerable. It should be noted that neither of the above has project status; applications have not been submitted; and environmental restraints on both are more severe than Altamont.
- c. The use of Kaiser gravel pits as a Class 3 disposal area cannot be relied upon. No application for such use is currently being pursued, and such is not likely to be approved prior to development of a comprehensive reclamation plan for all the quarry operations in the area (now in progress). Kaiser's application for a Class 2 and 3 site was rejected by the State Water Quality Control Board because of the possibility of groundwater contamination. In addition, the proposal met with heavy resistance from area residents.
- d. The Vasco Road site (EACDS) and the Durham Road site (Fremont) have been discussed above and in the responses to Oakland Scavenger Company.
2. This recommendation makes sense if the Joint Powers agency is able to issue its recommendations without undue delay. This is by no means assured, given the controversiality of the makeup of the ultimate Solid Waste Agency for the County. It should be noted that the Joint Powers Agreement is an interim agency, which will not "decide on...facility and site commitments," but which is set up solely for the purpose of determining the composition of the ultimate agency, which would only then commence study of the waste issue.
3. We concur with the first sentence. Regarding the second sentence, land filling may be relied upon less and less in the future, if strong commitment is made to resource recovery, but it is unlikely to become "obsolete" in the foreseeable future. Even under the extremely optimistic goals of the Alameda County draft Solid waste Management Plan, 33% of wastes would still be unrecoverable in the 1980's and 8% in the 1990's. Significant landfill capacity is still needed which is not available in existing sites.



4. PACE recommendations in this section have been discussed in the Draft EIR and require no response.
- E. The response from the Berkeley Solid Waste Management Commission is acknowledged. Responses to their comments follow:
1. It appears misleading to equate authorization of the landfill with adoption of an "Oakland Scavenger Solid Waste Management Plan." The initial recovery of ferrous metals does not preclude additional material and energy recovery, to which Oakland Scavenger Company has a publically-stated commitment. Furthermore, authorization of the landfill does not preclude early emphasis on resource recovery through public subsidy if such a decision was felt to be of such public interest as to overcome economic considerations.
- Achievement of 67% resource recovery for the 1980's, even if possible, leaves 33% of the solid waste stream for disposal. This would amount to over 1,000 tons per day; it is difficult to see, even if the County Plan goal is achieved, how it would make "unnecessary" the establishment of a new disposal site. Altamont represents less a "proliferation" of new sites than a consolidation of existing, less environmentally satisfactory sites. Its approval would reduce the number of sites in the County from the present eight to three by 1982. The Bay Area S.W.M. Project is discussed under D.1.a (responses to PACE). It should be noted that the fate of its report and recommendations would be uncertain for an unknown period of time after its presentation to the State Legislature. Information as it is made available from these studies should be considered in assessment of the project application.
2. The reference in the Irreversible Impacts section was to the commitment of energy resources and construction materials which would be used in site preparation, equipment, etc. The Unavoidable Adverse Impacts section on Page 99 of the draft EIR identifies "burial of material and potential energy resources" and "creation of a disincentive to resource recovery." Burial of material is not strictly irreversible because it is possible to recover it from the landfill after disposal. The disincentives to resource recovery posed by approval of the project were noted in various places in the Draft EIR.
  3. Exception is taken to the charge that the Draft EIR "dismisses the aesthetic and biological characteristics of the Altamont site as negligible." A total of 16 pages in the Draft EIR were devoted to a discussion of these aspects of the site, the impacts of the project thereupon, and specific mitigation measures to minimize the impacts. Nowhere are the site characteristics "dismissed." Page 68 addresses the question of the impacts of the project on the rodent population.



The overall impact of the project is discussed in the Visual Impacts section of the draft EIR, Pages 83-89, and in C.11. (response to Oakland Scavenger Company) of this Addendum.

It is simply wrong to characterize either the site or its vicinity as "unviolated by unsuitable activity" with respect to air, water, or land. The area is violated by smog blowing east from the Livermore Valley, two major railroads with extensive cut slopes in many places, an Interstate Freeway largely located in a massive cut area, the California and South Bay Aqueducts, Bethany Dam and Reservoir, overgrazing, dirt roads, and assorted structures. While it is undeniably true that the landfill would represent a significant intrusion upon this landscape, implying that the area is pristine wilderness is, at best, misleading. Furthermore, the site's reservation for agriculture could be assured under possible conditions of approval requiring it to be progressively reclaimed as such during, and after cessation of, operations.

Utilization of the Vasco Road site for six years would bring us to 1982, the target date for reduction of 67% in the waste stream, according to the draft County Solid Waste Management Plan. Again, even if this figure were achieved by then, 33%, or 1,000 tons per day would still have to be disposed of.

The Kaiser site is discussed in D.1.c. (response to PACE) of this Addendum. The central problem remains: no alternatives exist which would eliminate significant amounts of nonrecoverable wastes. Approval of the Altamont site may retard, but does not preclude, implementation of the measures described by the Berkeley Solid Waste Management Commission.

- F. The response of the Army Corps of Engineers is acknowledged. It appears that the project would require a Section 404 permit from the Corps if the District Engineer finds it is necessary to protect water quality. Usually, the Corps jurisdiction under the program is limited to waters with flows exceeding 5 cubic feet per second or lakes larger than 5 acres, and contiguous wetlands. Responses to their other comments follow:

1. There is no discrepancy between the rendering and the verbal description. Six to seven feet of earth cover will be placed on the fill faces; two feet will be placed on top of the fill (non-face portions).
2. Details "A" and "B" were inadvertently left out of the Draft EIR and are contained in the first part of Volume Two, the Addendum to the Draft EIR.

The possibility of erosion was anticipated by the applicant and proposed erosion control measures are described on Pages 52 and 13-14 of Volume Two, the Addendum to the Draft EIR. Desilting ponds, possibly operated in conjunction with leachate holding facilities

could be located downstream of fill cells and would provide additional mitigation of impacts arising from erosion and siltation. Vegetative cover should be re-established on finished portions of fill cell slopes and inactive borrow areas as soon as possible. Such revegetation should not be postponed to the formal closure stage. Revegetation of exposed slopes would appear to be the cheapest and most effective method of controlling erosion induced by sheet-flooding during periods of intense rainfall. Details of an erosion control program are also under the jurisdiction of the Central Valley Region Water Quality Control Board.

3. Protection of ground and surface water has been considered in the design of the project. On-site materials with the exception of sandstone bedrock can be readily borrowed to provide impervious cover material. The applicant has indicated that an impervious blanket will be placed over all finished fill cells and it appears that the daily cover that will be placed during cell filling will be largely impervious. Specific measures to be taken to prevent degradation of groundwater supplies are under the jurisdiction of the Central Valley Regional Water Quality Control Board. A leachate collector pipe will be installed in the toe of each fill cell. Other measures that could be undertaken if necessary include construction of a dewatering system to intercept and remove polluted water, leachate collector ponds lined with impermeable material or even extreme measures such as installation of bentonite slurry trenches or grout curtains across valleys to entrap polluted groundwater.

- G. The response of the City of Fremont is acknowledged. No comment is required.
- H. The response of the Alameda County Flood Control and Water Conservation District is acknowledged. District has informally responded that concerns expressed regarding surface water hydrology of the project have been satisfactory answered in the project engineering and geological reports. The first part of Volume Two, the Addendum to the Draft EIR, contains some of this data. Additionally, proposed drainage facilities and mitigation measures for impacts of erosion and siltation are discussed in F.1,2,3. above (responses to Corps of Engineers).

The ability of sanitary wastes to absorb water has been pointed out by Mr. William S. Johnson, Senior Engineer, California Regional Water Quality Control Board, Central Valley Region. He has expressed the informal opinion that a reduction in runoff may actually be experienced during fill cell development. After closure and cover with impermeable material, increased runoff is likely to be experienced unless retarded by a heavy vegetation cover. It should be noted that the existing geologic environment is conducive to greater than average runoff since most of the Altamont landfill area is underlain either by impermeable

sandstone and shale bedrock at shall depth or by relatively impermeable clay soil. Therefore, the increase in runoff may not be as great as would normally be expected. Provisions for erosion control facilities will be under the jurisdiction of the Central Valley Regional Water Quality Control Board. These facilities could include storm-water holding ponds if judged necessary.

- I. The response of the Citizens Advisory Council of the Eden Health Care Services Agency is acknowledged. We concur with their conclusions. As discussed in previous responses to comments, details of water quality monitoring and measures to be taken to mitigate impacts are under the jurisdiction of the Central Valley Regional Water Quality Control Board. Oakland Scavenger Company will be required to develop plans acceptable to that Board before disposal of refuse at the Altamont site will be permitted.
- J. The response of the East Bay Chapter of the California Council of Civil Engineers and Land Surveyors is acknowledged. No comment appears necessary.
- K. The response of the City of Livermore is acknowledged. Comments on their responses follow:
  1. Fill Areas 1 and 2 do not drain to Bethany Reservoir. Section V.A.1. (Pages 63-67) discusses the possibility of groundwater pollution and mitigation measures therefore; the first part of Volume Two, the Addendum to the Draft EIR, expands upon that discussion.
  2. Section VIII.B. (Pages 104-106) discusses alternative sites in the County. The discussion of alternative sites was limited to those which were considered viable in the sense that they accommodate existing or proposed landfill operations. The differences in impacts associated with alternative sites in the Altamont area would be negligible.
  3. The increment of pollutant concentrations from project-generated traffic during peak-hour and under severe meteorological conditions is summarized in the Table on Page 72 of the Draft EIR. The EIR notes (Page 73) that such traffic will not increase the incidence of above-standard levels of air pollution near the project site; under no circumstances will the increment be greater than 1% of the existing levels along the freeways.
  4. The East Bay transfer site under active consideration, at the foot of Davis Street in San Leandro, enjoys readily available rail access from a Southern Pacific spur track adjacent to that site. A considerably more serious problem is installation of rail access to the proposed landfill site. Pages 106-107 of the Draft EIR discuss the alternative of rail transport.



L. The response of the Association of Bay Area Governments is acknowledged.

1. The first ABAG comment deals with the theme that time be allowed (before action on the application) for formation of an inter-governmental management agency to implement the recently completed solid waste management plan for Alameda County. This is discussed in C.14. (response to Oakland Scavenger Company), D.2. (response to PACE), and E.1. (response to Berkeley Solid Waste Management Commission).
2. The ABAG letter incorrectly attributes to the Draft EIR the contention that an informed decision cannot be made on the application at the present time. Environmental Impact Reports assist in making better judgements by clarifying issues and by providing information about likely consequences of alternatives. However, an EIR on a major project will never answer all questions in a manner satisfactory to all reviewers. EIR's do not deal with absolutes and cannot provide completely accurate forecasting of future events. The EIR reports existing policy, it does not establish policy. It does not replace the decision-maker. Eventually there is a time of reckoning when judgement of the decision-maker plays to select a line of action. The Final EIR for the Altamont Landfill complies with requirements of CEQA and discloses sufficient information for an informed decision on the project.
3. Following are comments on specific issues cited by ABAG as being unresolved.
  - a. In January, 1976, the Alameda County Board of Supervisors indicated that sanitary landfill would be an acceptable use within an Agricultural Preserve area; however, the contract applying to the project site has not been modified.
  - b. As noted on Page 97 of the Draft EIR, the State Solid Waste Management Board has reviewed and approval authority over new solid waste disposal sites under SB 1797. The question of limiting the Altamont site to receipt of only Alameda County wastes is moot under the circumstances of the pending application since only Alameda County wastes are proposed to be dumped.
  - c. Impacts of the project on proposed resource recovery goals and policies of the County Solid Waste Management Plan are discussed in the Draft EIR on Pages 95-97, and in comments C.13., 14 (response to Oakland Scavenger Company) and E.1. (response to Berkeley Solid Waste Management Commission).
4. Following are comments on recommendations of ABAG for expanding the EIR:
  - a. Capacity available at existing landfills in Alameda County is illustrated by the table on Page 52 and discussed on Pages 51-54 of the Draft EIR. No Conditional Use Permit for a landfill on the Kaiser gravel pits near Pleasanton has been approved.



- b. ABAG requests that the EIR for Altamont be expanded to include "a reconnaissance of the physical environment of (the East Alameda County Disposal Site on Vasco Road) to provide the same level of detail as is contained in the Draft EIR for the Altamont Hill site." The Draft EIR for the Altamont project discusses the general environmental setting of the Vasco Road operation on Pages 111 and 112. There is no pending application for expansion of the Vasco Road operation. An EIR would be required if an application were submitted. In effect, ABAG is requesting preparation of an EIR for a project that is not pending, nor proposed. Preparation of an EIR is an expensive, time consuming undertaking which is not feasible unless in context of an application. Furthermore, whether expansion of the Vasco Road operation would have more or less environmental consequences begs the pertinent question of whether or not Altamont could be operated in a manner consistent with the objectives of CEQA, with County Solid Waste Management Policies, and with findings necessary for approval of a Conditional Use Permit as stated on Page 55 of the Draft EIR.
- M. The comments of the East Bay Bicycle Coalition are acknowledged. The letter was referred to Road Division of the Alameda County Public Works Department for evaluation. Road Division expressed doubt that Altamont Pass Road could be designated a "Major bicycle route" because of the noted factors enumerated by the referenced letter. It was further noted that the bicycle route adjacent and along the California Aqueduct has an inadequately paved and tire damaging surface.

The primary function of Altamont Pass Road is for vehicular traffic, auto and truck, whereby reconstruction to accommodate bicyclists and others will be dependent upon availability of future funds. However, Altamont Pass Road is being considered for inclusion into the Federal-Aid Secondary System (FAS). Road Division concluded that conflict between garbage hauling trucks and bicyclists should be at the minimum since no hauling will occur during the weekends and holidays when the greatest bicycle activities occur.



MINUTES OF PUBLIC HEARINGS





1. OAKLAND SCAVENGER COMPANY - C-3010, CONDITIONAL USE PERMIT to allow a sanitary landfill, in an A (Agricultural) District, located at 1840 Altamont Pass Road, north side, approximately one mile easterly of Dyer Road, Livermore Area. CONTINUED TO FEBRUARY 24, 1976

Mr. Flynn advised that this is a continued public hearing. The date of January 27 was chosen based on the anticipated release date of the Draft Environmental Impact Report of December 24, 1975. In actuality, the report was released January 14, 1976. Therefore, only some 13 days have elapsed since release of the draft. There has not been much opportunity for people to review the contents of the EIR. He indicated it is his intention to take whatever additional testimony on the part of the applicant to update the proposal and concerned testimony on the Draft EIR and continue this consideration to an additional hearing date of February 24. That date will still be within the review period of the Draft EIR for testimony to be entered regarding the contents of the Draft EIR.

Initial reply from the State Clearinghouse indicates they need the required 45-day review period, and we may still anticipate the earliest possible conclusion date of March 23. He asked for additional testimony by the applicant to update or supplement testimony submitted on this matter at the initial prior hearing.

Mr. Tom Meichtry, Project Director for the proposed landfill site, indicated he has no further information to submit this afternoon. He would like to hear comments on the project and will respond to them. They are still reviewing the Draft EIR and will respond to it in writing.

Ms. Lois Hill, from Livermore, indicated that the Livermore Community Recycling Committee has discussed this application and feels it is most important that reclamation of all reusable materials be increased in every way possible. The idea of approval of this landfill in several steps allows for flexibility in the Solid Waste Plan. Careful monitoring must be maintained to protect the environment.

As a member of the County Solid Waste Committee, she has worked to set up some kind of administrative setup so that recycling would become part of the whole system. She has felt all along that the proposals of Oakland Scavenger Company have been in compliance with the committee objectives and that they are doing a fine job. She hopes this application will receive careful consideration.

Mr. Flynn asked if her committee has had reference to the Draft EIR.

Ms. Hill replied they have.

Ms. Louisa Jaskulski indicated agreement with the comments of Lois Hill. We need a landfill site area in the County. The Altamont site is probably a fairly good choice. She feels this site should be approved but with conditions for strict controls of dust, reseeding, and water quality; the level of fill be lower than that proposed; and additional pressure on all interested agencies to continue to look for a resource recovery system as soon as possible; and look into other systems with other kinds of methods. She would like a time limit placed on the landfill. Ten years would seem reasonable to her. That would be about the time Site A will be reaching its capacity. She would also like to see periodic reviews, possibly every three years.

There was no other testimony submitted.

Mr. Flynn advised that this matter will be continued to February 24, 1976, for the purpose of taking additional testimony on the Draft EIR. This date will still be within the review period for the Draft EIR and will give ample opportunity to anyone to get comments in. We will then firm up a date for conclusion of this application, which date could be March 23.

There being no further business, the meeting adjourned at 1:59 p.m.

## (SPECIAL MEETING)

## MINUTES OF ZONING ADMINISTRATOR - FEBRUARY 24, 1976

1. OAKLAND SCAVENGER COMPANY - C-3010, CONDITIONAL USE PERMIT to allow a sanitary landfill in an A (Agricultural) District, located at 1840 Altamont Pass Road, north side, approximately one mile easterly of Dyer Road, Livermore area. (Continued from January 27, 1976) CONTINUED TO 3/30/76

Mr. Flynn stated that there would be a ten minute recess to allow the applicant's counsel to arrive.

The meeting resumed at 2:42 p.m.

Mr. Flynn stated that this meeting had been continued from January 27, 1976, for the specific purpose of taking testimony on the EIR and subject application. Mr. Flynn stated that comments on the Draft EIR from the State Clearinghouse have not yet been received, but that this Department will be notified of the Clearinghouse's position on the Draft EIR shortly after March 11, 1976.

He noted that the Final EIR would be available at the earliest by March 30, 1976. He indicated that the Final EIR will have to be completed before any action can be taken on the application. He stated that at the conclusion of today's testimony, he would continue the matter to a special meeting on March 30, 1976, at which time he would take additional testimony.

Mr. Flynn asked if the applicant had any additional testimony.

Mr. Tom Meichtry, representing Oakland Scavenger, was present. He stated that he had only a few brief comments. He indicated that in his opinion, this was a very fine EIR. He stated that in regard to the status of the Agricultural Preserve contract, the Board of Supervisors took action to add to the contract that sanitary landfills be included as a permitted use.

Mr. Flynn stated that the Board of Supervisors had agreed to include sanitary landfills in this specific contract but asked whether this had, in fact, been executed.

Mr. Jack Corley, representing the applicant, stated that the actual contract modification has not yet been accomplished.

Mr. Meichtry emphasized that additional information submitted to the County regarding various design features of the project were not reflected in the EIR in regard to design characteristics.

Mr. Flynn clarified that this additional information referred to is among data that was filed with the original application.

Mr. Meichtry indicated that is is Oakland Scavenger's understanding that specific questions relating to mitigation measures regarding water quality impacts will be worked out with Regional Water Quality Control Board after action on the Conditional Use Permit. Officially, Regional Water Quality Control Board cannot get involved until the application has received local approval.

Mr. Flynn asked if questions relating to geologic and water quality impacts are answered to the extent that Oakland Scavenger is capable of answering them at the present time in a letter from Bissell & Karn to Regional Water Quality Control Board recently added to the record.

Mr. Meichtry said that this is true. He stated that there will be subsequent meetings with RWQCB to discuss these impacts.

Mr. Meichtry indicated that by reducing the site fill area to 900' elevation, it will have significant impacts on the capacity of the site. He stated that Oakland Scavenger believes that the visual impacts are not as great as was indicated in the EIR. He noted that there are some additional minor points, and these points will be contained in written form and submitted to the Draft EIR.

Mr. Flynn asked if there were any public agencies wishing to speak on the application.

1. (Continued):

Mr. David Carpenter, Alameda County Engineering Geologist, was present. He stated that he has carefully reviewed the report submitted by Woodward-Clyde and that there are still questions that need to be answered before action can be taken on this application. He stated that additional information should be asked of the applicant's consultant regarding monitoring water quality, a better net base line for existing ground water quality, and also comments about construction of buttress fill design.

Mr. Flynn asked if there are still questions that cannot be answered by the information that was submitted by the applicant's consultants with the original application.

Mr. Carpenter confirmed this.

Mr. Flynn asked if there were any individuals or groups wishing to speak on this application.

Edith Lewis, representing the League of Women Voters of the Hayward Area, stated that since the League's study in 1972, we along with other Leagues throughout the country, have supported policies and programs to reuse, recycle and recover as many resources as possible from urban waste. We are aware that not all waste that is generated is reuseable and that disposal of the residue in sanitary landfills will be necessary in the foreseeable future. But as new energy recovery systems become more feasible, and if more people become less wasteful, the amount of landfill needed should decrease. The League agrees with a statement in the EIR which suggests that if there is a large capital investment in this project, it is conceivable that alternative methods to landfill disposal may not be given the consideration they deserve. We hope that this will not be the case. We strongly support the mitigation measures that are designed to protect the quality of the water. In light of recent reports of leachate into the Bay from the Hayward dump, we urge that a comprehensive monitoring program be devised. If ground water is contaminated, the effects could be long-term and possibly irreversible. The League in Alameda County has supported the proposed county-wide solid waste management plan which provides for periodic review. We believe that a review of the landfill should be included in each three year update of the county plan. Solid waste management problems do not respect city or county boundaries; some aspects of management may require regional solutions. While limiting disposal at the Altamont site to waste generated in Alameda County may be the best approach now, it would be short-sighted not to leave open the possibility of cooperating with neighboring counties. Solid Waste is being considered along with air and water in the environmental management program under the 208 grant to ABAG. Perhaps at the end of ABAG's study there will be a regional plan for solid waste management and the Altamont landfill can be evaluated at that time to determine if there are regional needs it could serve.

Barbara Shockley, representing the Coordinating Committee of the Eden Health Advisory Council, stated that the Committee reviewed the Draft EIR and had the following comments to make. With the knowledge that all sanitary landfill sites in the Central Metropolitan and Eden Planning Units (except Berkeley) will be closed by 1977, it is important that adequate provision be made for future disposal of that portion of our metropolitan wastes which cannot be recovered. Our interest is primarily on the impact of the proposal on water quality. We believe that methods for securing compliance with the following measures should be included in conditions for approval: (1) there must be close review and supervision by consulting engineers and engineering geologists; (2) a comprehensive water quality monitoring program particularly in the drainage to Bethany Reservoir and Livermore Valley must be provided; and (3) if the monitoring program reveals that contaminants are escaping the refuse cells, the project sponsors must specify measures to be undertaken to contain these contaminants. Because of the possibility of unforeseen problems such as unexpected contamination of ground waters, we advocate periodic review of the Altamont Landfill every three years. This review of a major element in the County's solid waste management scheme would take into consideration the



1. (Continued):

project's relationship to the County Solid Waste Management Plan as the latter is revised. We also ask that the permit be limited to ten years and fill for only Area I. Data from California Employment and Payrolls by the California Department of Human Development, January-March, 1972, indicates that there are 811 companies in hazardous waste generating industries in Alameda County. These were identified in a State Public Health Department study on hazardous waste. Land disposal of the industrial waste products, by ordinance, must occur in a Class I disposal site. We know, however, that hazardous wastes do find their way into Class II sites. We are very concerned about the need to monitor toxic and hazardous waste dumping into this proposed Altamont Landfill.

Sally Harris was present. She stated that her concern in this matter is that she is familiar with Conditional Use Permits in prior years on Quarries. She hoped that effectively enforced Use Permit conditions on isolated sites, to protect the underground water, and so forth, are enforced on Oakland Scavenger, as Oakland Scavenger has failed to comply with Regional Water Quality Control Board's conditions regarding water quality on their dump site located on the Hayward Shoreline. She hoped their monitoring system will be improved.

There was no additional testimony.

Mr. Flynn stated that this matter is continued to a special meeting on March 30, 1976, at which time additional testimony will be taken and the state's progress will be evaluated.

There being no further business, the meeting adjourned at 2:08 p.m.

RICHARD P. FLYNN - ZONING ADMINISTRATOR  
ALAMEDA COUNTY PLANNING DEPARTMENT



SUMMARY OF SIGNIFICANT COMMENTS ON THE DRAFT EIR  
RAISED AT PUBLIC HEARINGS DURING THE REFERRAL  
PERIOD, AND STAFF RESPONSES



SUMMARY OF SIGNIFICANT COMMENTS ON THE DRAFT EIR RAISED AT PUBLIC HEARINGS  
DURING THE REFERRAL PERIOD, AND STAFF RESPONSES

A. Zoning Administrator Meeting, January 27, 1976

1. Lois Hill, Coordinator of the Livermore Community Recycling Center, offered the following comments concerning the proposed project:

- a. It is most important that the reclamation of all reusable materials be encouraged in every way possible.
- b. It seems reasonable that recycling can be required without banning a landfill, which might create a crisis situation.
- c. The idea of approval of this landfill in several stages allows for flexibility in the solid waste plan.
- d. Careful monitoring must be maintained to protect the environment.

The comments of the Livermore Community Recycling Center are acknowledged. The points above were discussed in the draft EIR and need no additional comment.

2. Ms. Louisa Jaskulski spoke and indicated agreement with the comments of Lois Hill. She said that the site should be approved but with conditions for strict controls of dust, reseeding, and water quality; the level of fill should be lower than that proposed; and additional pressure put on all interested agencies to continue to look for a resource recovery system as soon as possible. She would like to see a time limit placed on the landfill; ten years seemed reasonable. She felt periodic review should take place, perhaps every three years.

Ms. Jaskulski's comments are acknowledged. All points raised were discussed in the draft EIR and need no response.

B. Zoning Administrator Meeting, February 24, 1976

1. Edith Lewis, representing the League of Women Voters of the Hayward Area, offered the following comments:
  - a. The League agrees with the statement in the draft EIR which suggests that if there is a large capital investment in this project, alternative methods to landfill disposal may not be given the consideration they deserve.



- b. The League strongly supports the mitigation measures designed to protect water quality, and urges that a comprehensive monitoring program be devised.
- c. The League feels that review of the landfill should be included in each three-year update of County Solid Waste Management Plan.
- d. While limiting disposal at the Altamont site to waste generated in Alameda County may be the best approach now, it would be short-sighted not to leave open the possibility of cooperating with neighboring counties. The environmental management program being studied under the 208 grant to ABAG may produce a regional plan for solid waste management in which the Altamont landfill site may play a part in serving regional needs.

Points a, b, and c were discussed in the draft EIR and need no additional comment. Regarding point (d), the draft EIR noted that assessment of impacts on other bay area counties which would occur if the Altamont site accepted refuse from outside Alameda County was beyond the scope of the EIR analysis. The alternative of conditioning the Conditional Use Permit to limit wastes to Alameda County is discussed on Page 110 of the draft EIR. Disposal of wastes from outside the County is not part of the project proposal. Any arrangement to accept non-County wastes would require supplemental environmental analysis.

- 2. Barbara Shockley, representing the Coordinating Committee of the Eden Health Advisory Council, presented comments at the hearing. Those comments are contained in a letter from the Council and presented and responded to elsewhere in Volume Two.
- 3. Sally Harris expressed concern that Oakland Scavenger Company may not comply with conditions placed upon granting of its application. She noted that the company has failed to comply with Regional Water Quality Control Board conditions on their dump site located on the Hayward shoreline.

Ms. Harris' comments are acknowledged. Responsibility for monitoring projects to ensure zoning actions are enforced and for taking enforcement action rests with the County Building Inspection Department. In addition, the Central Valley Regional Water Quality Control Board has responsibility for monitoring water quality protection. Formulation of a detailed plan for monitoring compliance with Regional Water Quality Control Board requirements is a component of the waste discharge permit. The regional board has powers to require termination of a violation and to impose fines for non-compliance.



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